

ANEC rejects read across approach concerning the EU-Ecolabel for office buildings

ANEC fundamentally disagrees with the approach chosen in the document on the Development of European Ecolabel Criteria for Office Buildings, as circulated in May 2012.

The read across approach was defined "*as the specification of criteria within an existing building environmental labelling scheme which can contribute towards EU Ecolabel certification*".

This approach is entirely unacceptable because technically unfeasible. This is due to the great variety of criteria in the different existing assessment schemes and gaps that inevitably occur: the different metrics for technical criteria, the impossibility to prove equivalence by conversion factors, the great margin of level of ambition, etc. Even if these problems were solved, it is highly questionable why a building owner would choose to pay for another label without added value. Hence, the result is not worth the effort.

In addition, any bridging documents containing complementing requirements to national schemes to meet EU-Ecolabel criteria for office buildings would have to be continuously updated, that would constitute a big burden and require a lot of resources. This approach would significantly delay the whole process which is already behind schedule. There is also a risk of discrimination of existing schemes other than the main ones which are discussed in the paper.

Beside the fact that this approach is completely new to the participants in the work on this specific label, it sets a negative precedent. The added value of the EU Ecolabel, i. e. to set specific, relevant criteria and award only the best performing products within a product group on a European scale, would likely be sacrificed to ease the interest of national programme holders and LCA-practitioners. This approach would reinforce the primacy of national criteria setting and reduce the EU-Ecolabel to a mere add-on.

ANEC has strong reservations to rely predominantly on LCA-methodology, as it features fundamental shortcomings, including dependency on numerous subjective choices, lack of adequate data and limited precision. Further, LCA methodology does not characterize all environmental impacts in a suitable way. Hence, award systems based on a choice of LCA indicators (as in some of the current national schemes) are rejected by ANEC (see also the ANEC position



Paper "Environmental assessment goes astray – a critique of environmental footprint methodology and its ingredients")¹

ANEC recommends to work with the results of the "EMAS Reference document on best environmental management practise in the building and construction sector" (Draft May 2012), also elaborated by JRC, which we see as a good example from a consumer's perspective.

¹ ANEC position paper " Environmental assessment goes astray – a critique of environmental footprint methodology and its ingredients", May 2012 (available at [http://www.anec.eu/attachments/ANEC-ENV-2012-G-008final%20\(3\).pdf](http://www.anec.eu/attachments/ANEC-ENV-2012-G-008final%20(3).pdf))