Ecolabel & GPP Criteria for Buildings

JRC IPTS Reply to Stakeholders' Comments

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1. BACKGROUND

The European Commission intends to develop a EU Ecolabel for the "Buildings" product group. "Buildings" are estimated to consume around 40% of the total energy consumption in Europe and cause other negative environmental impacts during their life-cycle. The implementation of an Ecolabel for "Buildings" is expected to result in a significant potential for environmental impact reduction with limited costs and efforts.

Keeping in mind this aim, the Italian Competent Body commissioned intensive research activities that result in the 3rd draft criteria for the EU Ecolabel for "Buildings". This study, presented in August 2010, grouped buildings under "new" and "existing ones" and slightly different criteria for each type were proposed.

Due to the high number of comments received from the stakeholders, IPTS was charged of performing an analysis and evaluation of the 3rd draft criteria document. As main result of this analysis, it was proposed to limit the scope of the project to office buildings (new and existing office buildings) and to exclude in this initial phase residential buildings. The main reasons were the high environmental impacts of this type of buildings, its large aggregated stock figures in EU and expectation of growth, the high harmonization potential with regard to other product policies such as GPP and the high effectiveness potential of the EU Ecolabel. Companies are generally the owners of office buildings and have a high interest in communicating their environmental commitment to the public. There is also a high potential for harmonization with existing labeling schemes at Member State level.

In addition, an analysis and evaluation of the Ecolabel criteria included in the 3rd draft criteria document was carried out. From this analysis some improvements and modifications raised. Among them, the set up of a stricter benchmark for the total energy consumption of the building depending on the climatic area, altitude or age of the building, the promotion of renewable energy systems, lower consumption lighting, reduction of water consumption or the collection and sorting for proper valorization of the waste are some of the most remarkable ones.
2. OBJECTIVES OF THIS DOCUMENT

The aim of this document is to summarize the discussion and feedback on the proposal of IPTS to develop criteria for Ecolabel and GPP for office buildings. The proposal was presented at the EUEB meeting in Brussels October 20th and distributed to EUEB and GPP AB members via the document "Analysis and evaluation of 3rd draft criteria for Buildings and next steps" which generally describes the area and potential buildings and develops the proposal for the actual scope of the product group for Ecolabel and GPP criteria.

As the request for comments addressed both the EUEB and the GPP AB, in total 26 Member States and 4 organisations were contacted, which in turn distributed the request in the respective Member States or related organizations. As a deadline for replies November 15th was determined in order to accelerate the discussion process. However, also replies received after this date was taken into account for this summary and analysis.

As the request for comments encouraged actively those respondents who wish to see the proposal modified or rejected as a whole, we understood those organizations which did not reply as supporters of the proposal in the context of this analysis.

3. SUMMARY OF THE STAKEHOLDER COMMENTS

Further to the comments during the meeting, sixteen participants sent us their comments on the analysis study. 5 of these were supporting the proposal for limiting the scope to office buildings, 1 had an opposing/deviating opinion, and 10 did not comment on the scope but on methodological issues. Comments of the latter type were considered as approval for the scope of the product group.

The most important comments concerning the new scope of the EU Ecolabel for "Buildings" are summarized in this section:

3.1.- Supporting comments

Most of the comments support the proposed idea of approaching the different buildings types individually. In addition, they support the change of scope towards office buildings as starting point for developing the EU Ecolabel for "Buildings" due to the expected higher benefits that it may bring.
- One comment proposed to focus the EU Ecolabel criteria on the refurbishment of the office buildings because of the higher improvement opportunities. The stakeholder suggested the analysis seems to be a focus on building design and therefore new build in respect of office building. It is pointed out the low renewable rate of the existing building stock and that consequently the improvement opportunity is therefore in respect of refurbishment existing office buildings.

3.2.- Deviating or opposed reactions

- One comment partially disagrees with the new scope and suggests restricting the scope to new buildings and dividing the criteria catalogue into residential and office buildings. However, the comment concludes with the possibility of developing an Ecolabel for existing buildings in case of substantial renovations.

3.3.- Comments related to the methodology

Apart from the comments concerning to the scope of the EU Ecolabel for "Buildings", suggestions to improve the Ecolabel criteria have been also received. They are briefly summarized in the following lines:

- As an improvement of the 3rd draft criteria document, it is suggested not to promote any material or technology unless they are based on LCA data for the whole life cycle. This proposal has been welcomed by several stakeholders.

- Buildings are products which include many different parts and must be assessed with reference to their location, use and the equipment installed in. It is proposed to assess their performance instead of all technical and constructive characteristics.

- The concern about the importance of including recyclability criteria and techniques to monitor it in the EU Ecolabel has been addressed. It is suggested that the criteria on transportation of structural and recoverable materials should be revised.

- Concerns are expressed about the harmonization of the EU Ecolabel with existing Type 1 Ecolabels and with other EC sponsored initiatives such as TC350 and TC59. Closer harmonization between EU Ecolabel and these existing initiatives is vital to reduce the administrative burden on business and ensure that work is not duplicated. Stakeholders
encourage IPTS to develop well elaborated criteria in order not to get conflicts with the well elaborated existing guidelines for sustainable construction of buildings of some MS.

- Concerns about the achievement of comparable results for the energy performance of buildings that can serve as benchmark across the EU due to the several MS standards for its calculation have been expressed.

- A suggestion addressed that a balance between the embodied energy and the service life of the materials should be somehow proposed.

- One stakeholder commented that the proposed study has too much focus on environmental performances and is non-balanced with the social and economic performances. This feedback comments that the presented study mixes up ecological and sustainability labels, being needed to taken into account the economic aspects into it.

4. IPTS DISCUSSION ON THE DETAILED COMMENTS

In the following the IPTS point of view regarding some received comments is discussed:

- A common comment addresses that the building Ecolabel criteria should fit with the intensive work programme of the CEN committee and the initiatives carried out by several MS, without lower the quality of these standards and labels and without creating misunderstandings in the EU legislation. Moreover, some stakeholders expressed their concerns related to a simultaneous development of the Ecolabel and GPP criteria.

IPTS agrees with the abovementioned comments and aims to develop Ecolabel criteria harmonized to the existing and coming standards and national labels. Our objective is to add value to the best environmental performance buildings by labeling them with a European Ecolabel that can be easily recognized and understood. In addition, we believe that the requirements to develop both kinds of criteria are different but similar. Thus, the simultaneous development of GPP and Ecolabel criteria can save resources and avoid ex-post harmonization between both policy tools. The criteria statement depends in the end on the outcome of the technical analysis and the discussions in the working groups meetings.
Another common comment addresses the necessity of establishing global energy consumption and criteria based on the assessment of the building, instead of focusing on isolated construction products or technologies.

IPTS aims to set up criteria limiting the overall energy performance of the building as well as not to restrict the use of construction products or technologies. However, depending on the results of the LCA, the establishment of partial energy consumption limits (heating, air conditioning, lighting, etc) or construction products or technologies can be required.

- Some stakeholders addressed by the fact that recyclability of buildings should be an important criterion to deserve an Ecolabel. However, they don’t agree with the best approach.

IPTS considers that the recyclability of the materials as well as the dismantling and demolition phases of the building should be considered into the LCA studies. The development of criteria related to this end-of-life phase will be carried out by taking into account the results of these studies.

5. SUMMARY AND CONCLUSIONS

This paper aims to summarize the discussion and feedback on the proposal of IPTS to develop criteria for Ecolabel and GPP for "Buildings". The proposal was presented at the EUEB meeting in Brussels October 20th and distributed to EUEB and GPP AB members.

In the light of the comments, IPTS considers stakeholders support the change of scope of the EU Ecolabel. Consequently, the technical support studies to develop an EU Ecolabel for "Buildings" focusing on office building will be started in the near future.

A number of comments were obviously expressed under the assumption that the distributed document already represented the preliminary report and a new (4th) criteria proposal for buildings. In fact the document outlines the area of work to be undertaken and can only be understood as a preparatory scoping document. However, comments concerning methodological issues such as the age (new and renovations) of the buildings and its influence on the Ecolabel criteria to be developed will be considered during these studies and will be discussed in the forthcoming working group meetings.
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