

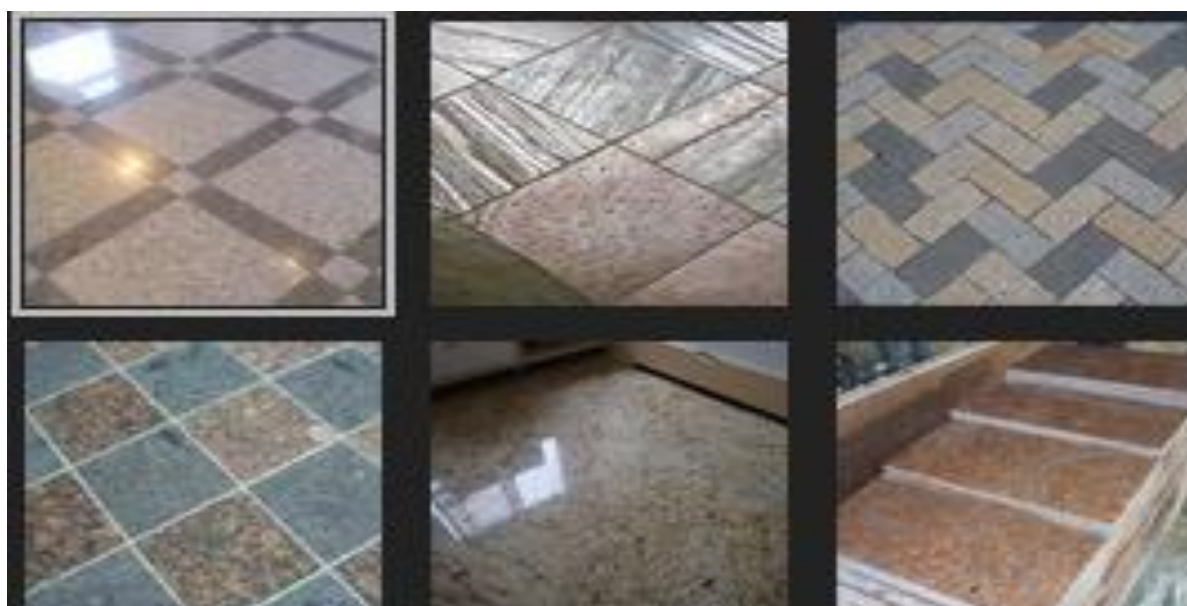
Revision of EU Ecolabel criteria for Hard Coverings

Initial Scoping Questionnaire

Analysis of responses

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1 Foreword

The identification of any relevant issues at the earliest stages of the criteria revision process is vital to ensure that research efforts are focussed in the correct areas. Therefore an initial scoping questionnaire was sent out to all parties who expressed their interest in the revision at the very beginning of the process. Apart from general information about the respondent, the online questionnaire asked some higher level strategic questions about the product group in general, the scope and, for those who were interested, some specific questions about the suitability of the existing criteria.

2 General information

2.1 Type of respondents

A total of 20 stakeholders answered the initial scoping questionnaire. The most representative share of respondents was manufacturers of hard covering products (11 respondents, i.e. 55% of all responses). Others respondents were: consultant or research organisations (3 respondents, 15%), manufactures or trade associations (4 respondents, 20%), government or similar (2 respondents, 10%).

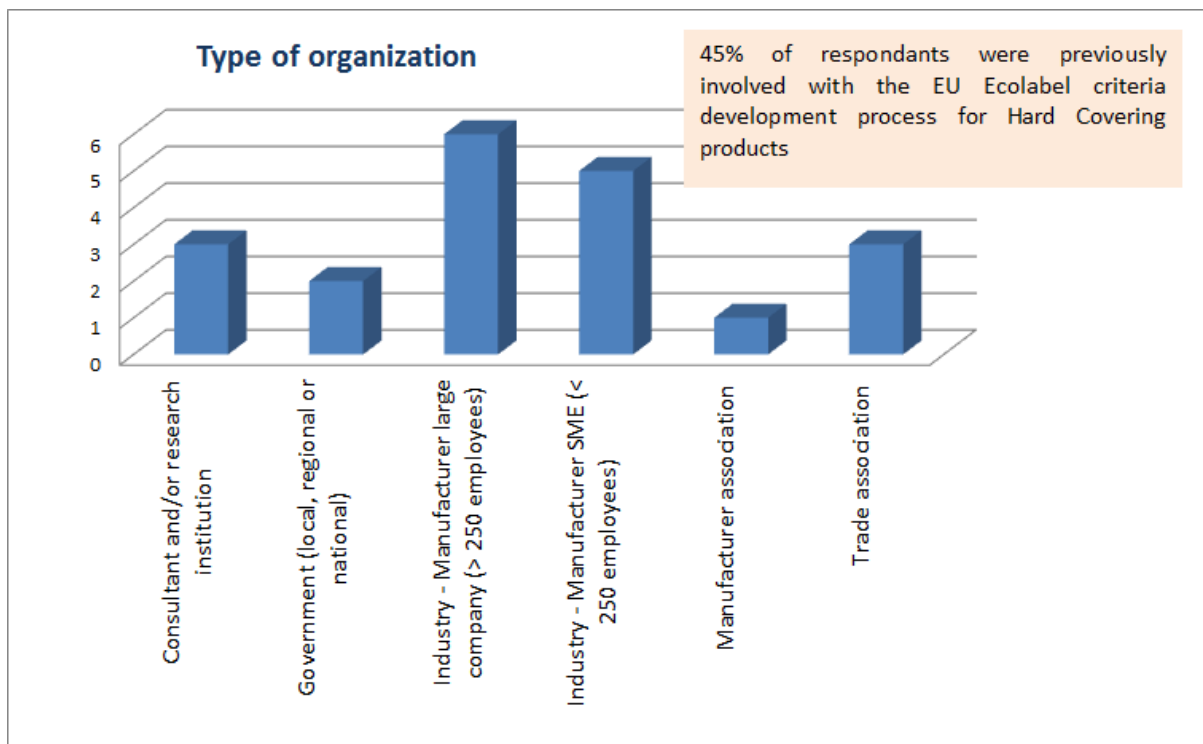


Figure 1: Classification of stakeholders by interest or type of organization

Another question referred to the respondent's relationship with the current EU Ecolabel.

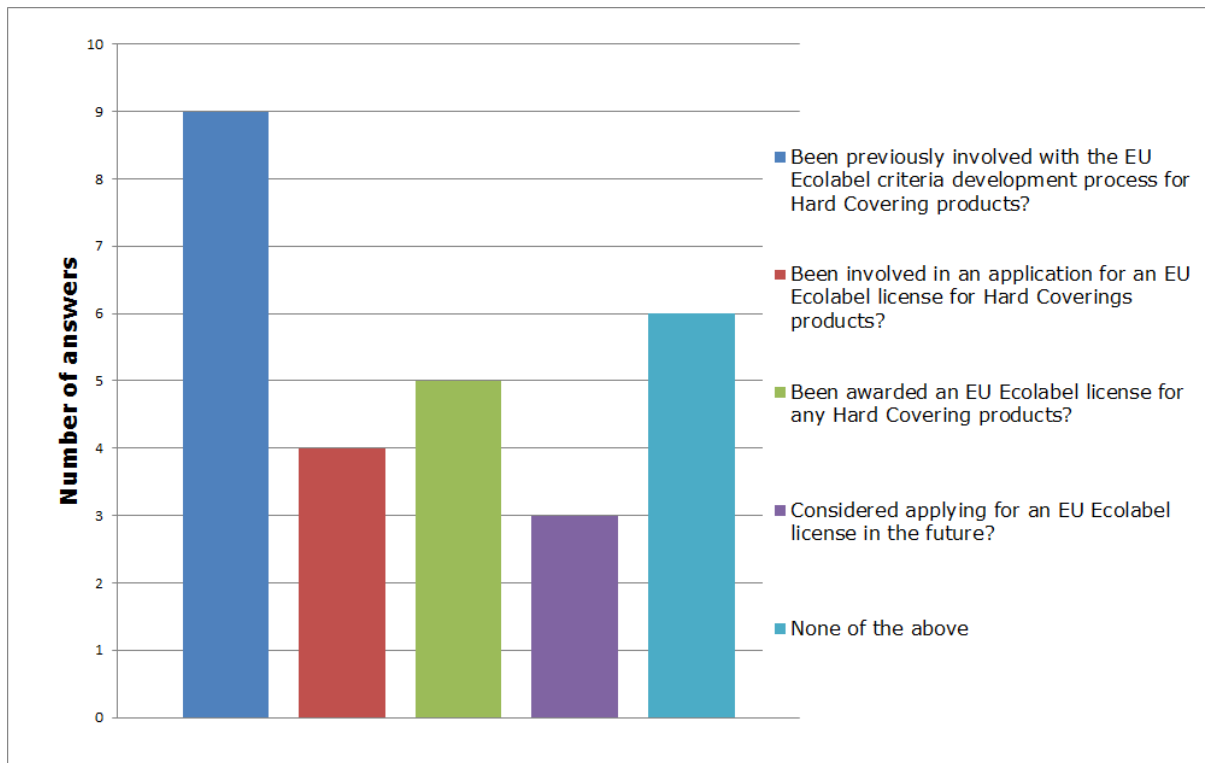


Figure 2: Involvement of the stakeholders with the EU Ecolabel

A total of 70% of respondents had some previous experience with the EU Ecolabel criteria for Hard Coverings – either during the criteria development process (45%), application for an EU Ecolabel (20%), obtaining an EU Ecolabel (25%) or simply by considering applying for the EU Ecolabel (15%).

Interestingly, a total of 55% (11 of 20) respondents had been involved in product assessments relating to greenhouse gas emission footprints (9 of those 11 being as part of EPDs). When only considering those respondents that could potentially apply for the EU Ecolabel (i.e. industry), the figure rose to 73% having previously worked with EPDs or carbon footprints.

2.2 Higher level questions

A number of broad questions (e.g. factors that could help EU Ecolabel uptake and approaches to energy consumption control) were asked which virtually any stakeholder could offer an opinion on.

2.2.1 **Recognition by Green Building Assessment schemes**

Currently both BREEAM and LEED recognise and award credits for the use of a minimum number of construction products with EPDs. All of the sub-products covered by EU Ecolabel for Hard Coverings can be considered as construction products. Given the success of these schemes, it is logical to ask if the

recognition of EU Ecolabel products would be considered of added-value to manufacturers.

Due to the relative importance of the public sector to the Hard Coverings market (e.g. in infrastructure, public buildings and exterior paving almost everywhere) it was also worth asking what would be the potential importance of developing EU Green Public Procurement criteria for Hard Coverings to support uptake of the EU Ecolabel.

For these two considerations, the following feedback was received:

- **80%** of respondents felt that recognition of the EU Ecolabel in Green Building Assessment schemes such as BREEAM and LEED would be important (**15% were unsure** and **5% said no**).
- **65%** of respondents felt that public procurement was important or very important for the Hard Coverings product group (**30% were unsure** and **5% said it was unimportant**).

From this feedback, it is clear that efforts should be made to liaise with representatives of Green Building Assessment schemes to try and reach an agreement over how they could potentially recognise the environmental benefits associated with EU Ecolabel Hard Covering products by awarding points to such products under their schemes.

Although no development of Green Public Procurement criteria for Hard Coverings is foreseen in the Commission's workplan, the responses to this questionnaire suggest that it would be worthwhile to develop EU GPP criteria for Hard Coverings that support the EU Ecolabel criteria – at least once those Ecolabel criteria have been revised.

2.2.2 EU Ecolabel approach towards energy efficiency

Energy consumption is one of the major environmental issues related with Hard Coverings. There are different ways to reduce the environmental impacts associated with energy consumption: (i) improve the efficiency of the process, (ii) increase the percentage of renewable energy sources required or (iii) set a limit based on CO₂ equivalent emissions. Each option has its benefits and drawbacks.

- Energy efficiency is something that the applicant can directly control in most cases and which is in their own interests due to the fact that energy is generally expensive in Europe. However, this latter point is also the main drawback because it can be argued that industry already wants to be as energy efficient as possible, but only within the windows of acceptable returns on investment in more efficient equipment.
- Requirements on renewable energy have a direct benefit on the environmental impact of the producer and their products but simply requiring renewable energy alone could mean that an energy efficient

installation using fossil fuel could be unable to apply for the EU Ecolabel while an inefficient installation using biomass could.

- A requirement of the greenhouse gas emissions of the product are of direct interest to consumers and fits in well with the growing trend of EPDs for construction products. Such a requirement rewards both increases in energy efficiency and increases in renewable energy sources used and so gives flexibility to producers in how exactly to improve.

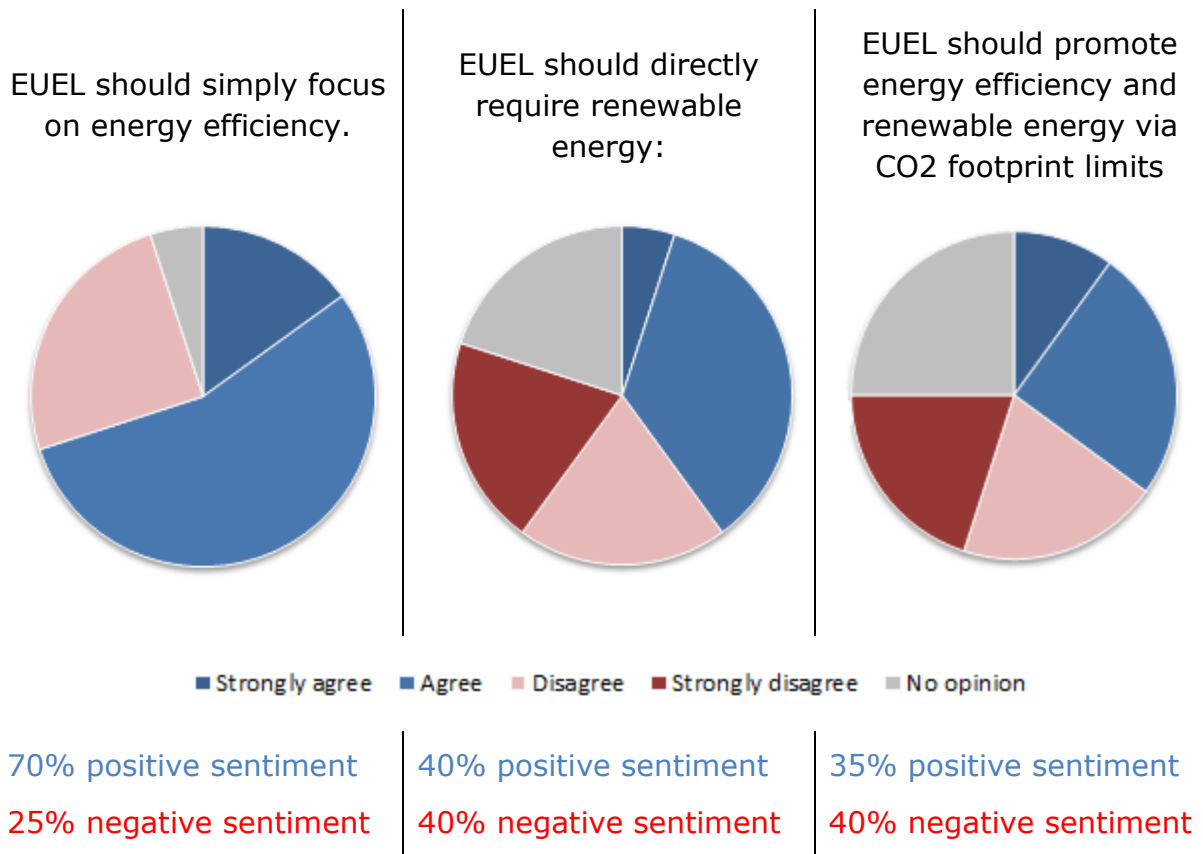


Figure 3. Feedback relating to approaches to energy consumption.

From the responses received, a clear preference for direct requirements on energy efficiency was expressed. Considerably less support was expressed for minimum requirements on renewable energy or on CO₂ emissions. This was surprising given that 11 of the respondents had previously been involved in EPDs, where one of the key indicators is global warming potential.

Specifically with ceramics, it was considered that a single energy consumption reference value for all ceramics was not suitable given the diversity of products that can fall under this sub-product category. Further discussion would be needed in order to understand exactly how ceramics could be split up into different categories and what would be a suitable reference value for each category.

It was considered that a single value based on MJ/kg would not incentivise the potential environmental benefits of thinner tiles (thicknesses can range from 3mm to 30mm). A better functional unit would be MJ/m².

2.2.3 General impressions about EU Ecolabel criteria for Hard Coverings

The current criteria set out in Decision 2009/607/EC have been structured in such a way as to reflect the life cycle impacts of all the sub-products in parallel. Not all of the criteria are relevant to each sub-product, so it can be quite difficult to read from the perspective of a potential applicant who is only interested in one particular sub-product.

Consequently, it was considered relevant to ask for the general impressions that stakeholders have of the current criteria.

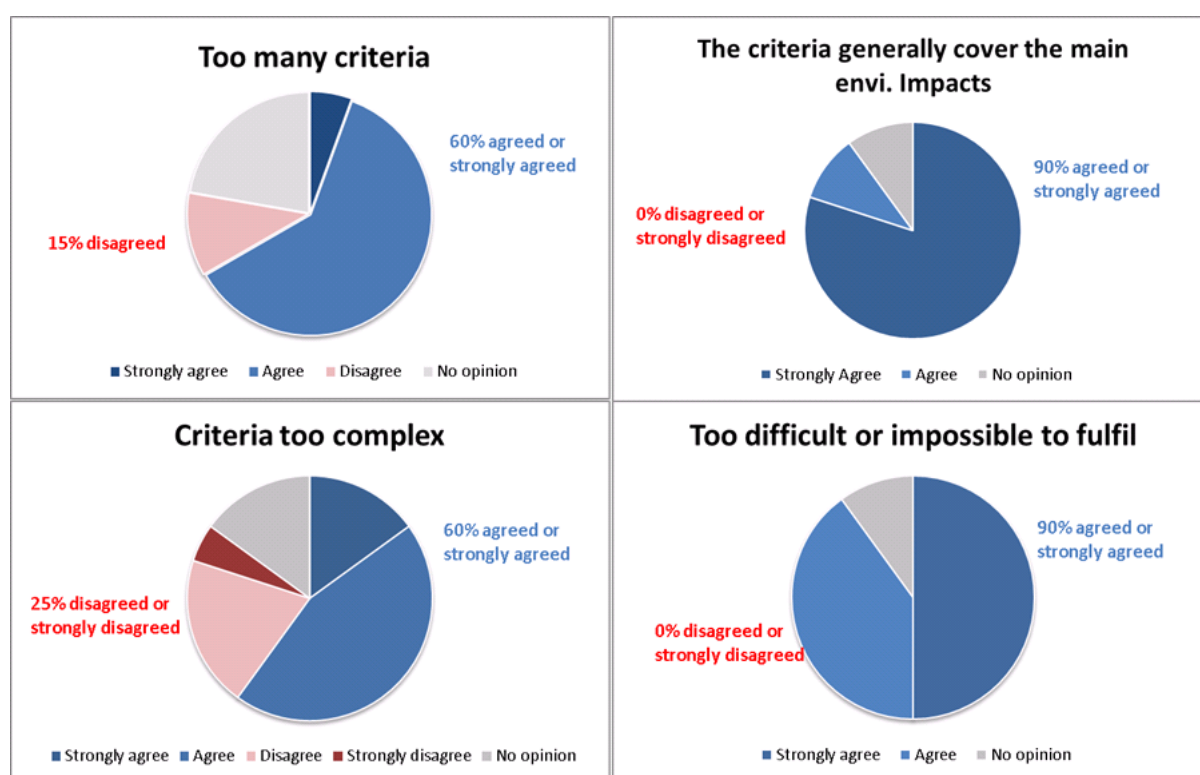


Figure 4: General overview about the criteria

Most of the respondents (60%) considered that there were too many criteria and that they were too complex. It is uncertain if this was considered for one particular sub-product alone (i.e. ceramics) or for all of them.

A major concern is that 90% of the respondents considered that the current criteria are too difficult or impossible to fulfil. However, at the same time 90% of respondents also thought that the existing EU Ecolabel criteria covered the main environmental impacts of Hard Covering products. The only conclusion that can be drawn from those two potentially conflicting statements is that the EU

Ecolabel criteria cover the main environmental impacts of hard covering products too well!

Despite the fact that the existing criteria are considered to cover the main environmental impacts of Hard Covering products, a clear need to simplify the criteria has been expressed. One particular concern mentioned was that only factors that the applicant can directly control should be set in criteria.

It is uncertain to what extent such complexity has impeded the uptake of the EU Ecolabel for Hard Coverings. However, considering that most of the respondents concerned about the complexity had already been involved in the EU Ecolabel before, it can be assumed that those who were not involved will only find it even more complex.

2.3 Scope and definitions

Almost all respondents (19 out of 20) to this first scoping questionnaire were based in the main European production centres for ceramic tiles, natural stone and agglomerated stone (i.e. Italy and Spain). Based on responses to later questions, it became clear that the main interest of almost all respondents was in ceramic tiles rather than terrazzo tiles, natural stone, agglomerated stone, concrete paving units or clay tiles. This is a serious limiting factor for the value of results from the questionnaire and greater efforts will be needed to engage with relevant stakeholders representing these sub-products.

Nonetheless, some interesting comments were made about the scope of the product group. It was proposed to explicitly include the following in the scope:

- Resins, plastic and metal.
- Large format ceramic tiles
- Porphyry
- Kitchen and bathroom countertops

The last 3 of the suggestions can certainly be considered in the scope although further discussion would be needed to clarify exactly what is proposed in the first suggestion in the list above.

2.4 Criteria for ceramic products

Since respondents did not express any interest in the criteria for other sub-products apart from ceramics, this section is dedicated solely to the ceramics criteria. The responses to each of the sub-criteria for ceramics are summarised below:

Table 1. Opinions on existing EU Ecolabel criteria for ceramics

Requirement	Keep as it is	No opinion	Modify	Remove
Total cold emissions (pressing, glazing, and spray drying) <5g/m ²	11 (55%)	6 (30%)	3 (15%)	0 (0%)
Firing - Particulate matter (dust) <200 mg/m ²	12 (60%)	2 (10%)	6 (30%)	0 (0%)
Firing - Fluorides (as HF) <200 mg/m ²	15 (75%)	2 (10%)	3 (15%)	0 (0%)
Firing - Nitrogen oxides (as NO _x) <2500 mg/m ²	6 (30%)	2 (10%)	11 (50%)	1 (5%)
Firing - Sulphur dioxide (SO ₂) - 1500 mg/m ² (if S content in raw material <0.25%)	6 (30%)	2 (10%)	10 (50%)	2 (10%)
Firing - Sulphur dioxide (SO ₂) - 5000 mg/m ² (if S content in raw material >0.25%)	6 (30%)	2 (10%)	10 (50%)	2 (10%)

Of the four options for respondent opinions, requests to remove a criterion were very rare and there were not so many "*no opinions*" either.

A split in majority opinions can be seen in Table 1 between emissions of particulate matter (PM) and HF, where the existing criteria were considered as okay, and with the emissions of S and NO_x, where it was considered that the criteria should be modified.

One concern with the emissions of S and NO_x was that this could easily be met simply by switching to natural gas. Other reasons for requesting modification of the emissions criteria for ceramics were based on the fact that production techniques have changed considerably for ceramics, especially with the shift towards larger and thinner tiles and changes in enamelling techniques.

Other comments were made that the criteria ambition levels could be improved and that the EU Ecolabel ambition level should always be higher than any minimum legal requirements (presumably referring to requirements for European operating permits for ceramic factories that were set under the old IPPC Directive). However, on the other hand, it was questioned if criteria for Pb and Cd for glazed tiles were necessary since these were originally developed for ceramics considered to come into contact with food.

3 Conclusions

The initial scoping questionnaire has served to show that the best represented (and most discussed) sub-product within the scope for EU Ecolabel Hard Coverings is likely to be ceramic tiles. Stakeholders representing the other sub-products will need to have an input to ensure that those sub-products remain in the scope.

Serious concerns exist with regards to the existing criteria, due to their complexity and difficulty in complying with.

Some interesting possibilities to improve the potential uptake of EU Ecolabel for Hard Covering include the expansion of the scope to include kitchen and bathroom countertops, to develop complimentary GPP criteria and especially to obtain some sort of recognition of EU Ecolabel Hard Covering products by Green Building Assessment schemes such as BREEAM or LEED.