Revision of the Ecolabel criteria

for wooden floor coverings

27 March 2014

##

## QUESTIONNAIRE IDENTIFICATION FORM

|  |  |
| --- | --- |
| First name: | Surname: |
| Organisation: | Job Title: |
| Email: | Phone Number: |
| Organisation type: |
| [ ]  Industry  | [ ]  Government | [ ]  NGO  |
| [ ]  Environmental Agency | [ ]  Retailer | [ ] Other \_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

**STAKEHOLDERS ARE KINDLY ASKED TO SEND THEIR FEEDBACK DIRECTLY TO THE PROJECT TEAM PER E-MAIL BY THE** **20/04/2014**

to ensure that all comments can be fully considered in this process:

E-mail: **JRC-IPTS-FLOOR-COVERING@ec.europa.eu**

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## EU ECOLABEL

The EU Ecolabel is an instrument which has been introduced in the European Union to encourage and stimulate the production and consumption of more environmentally friendly products and services throughout their life cycle. This scheme helps purchasers and consumers to make more informed decisions through certification of the environmental credentials of a product or service.

According to the information facilitated by the web of the European Commission, the EU Ecolabel is a voluntary label that helps you identify products and services that have a reduced environmental impact throughout their life cycle, from the extraction of raw material through to production, use and disposal. When developing the EU Ecolabel criteria for products, the focus shall be put on stages and aspects in which the product has the highest environmental impact, and this differs from product to product. The requirements shall be established at the level which can be met by around 10 to 20% of most environmentally friendly products available currently on the market.

For more details please see: <http://ec.europa.eu/environment/ecolabel/>.

## OBJECTIVE

This document constitutes one of the initial stages of the revision of the EU Ecolabel for wooden floor coverings. The revision process takes into account the possible amendment or prolongation of the product scope and consequently provides new criteria with additional ecological value.

The main goals of the revision is to identify the barriers that EU wooden floor covering producers faced to comply within the Ecolabel scheme and obtain new simplified rules encouraging them to be compliant. This document is intended to be circulated to stakeholders in order to raise awareness of this revision and to obtain feedback on existing criteria and proposed changes. Contact with relevant stakeholders, such as competent bodies, NGO, manufacturers and retailers is essential to evaluate the current Ecolabel criteria.

We ask you to read this document carefully and provide your feedback using the associated comment fields.

## INSTRUCTIONS

As stated above, this stakeholders' consultation form is one of the first steps of the process to revise the EU Ecolabel criteria for wooden flooring. The stakeholders' opinion is vital to know the main barriers that they find regarding the practicability of the current criteria and to ensure that the revised criteria will be more appealing to the industry (taking into account that so far there is not any licence-holders of the EU ecolabelled wooden flooring).

We would highly appreciate your feedback on the questions, proposals and other points given above with the aim to know your opinion and to take it into consideration prior to the AHWG meetings.

 Information supplied will remain confidential and anonymous.

The draft criteria will be discussed with stakeholders at the first AHWG meeting on wooden floor coverings in October 2014 in Seville.

## PRELIMINARY DISCUSSION POINTS

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| Preliminary points for consideration in the criteria revision  |
| There **aren’t any EU ecolabelled wooden floor coverings on the market**, even though ecolabelling for floor coverings is quite spread in other environmental schemes (such as Blue Angel, Nordic Swan, etc). Therefore, it is important to find out the possible barriers and reasons that prevent producers from applying to this scheme and revise the current criteria to take into account these concerns. **Considering this, any additional feedback from stakeholders with the objective of improving the existing criteria is welcome, EVEN on issues not highlighted below**. Comments will be gathered to provide further evidence during the revision process. A few general questions are given below. Please feel free to indicate any other issues of relevance. |
| Questions to stakeholders (mainly for manufacturers, retailers, industrial associations) |
| Do you know what is the Ecolabel scheme? | [ ] Yes [ ] NoIf yes, please specify where you did hear about it. |
| Do you know that there is an Ecolabel scheme for wooden floor coverings? | [ ] Yes [ ] NoIf yes, please specify where you did hear about it. |
| Do you know any other environmental labels on wooden floorings? | [ ] Yes [ ] NoIf yes, please specify which ones and which is the most relevant in your market |
| Has your organization identified an increasing interest or a need for environmental labelled products on the current market? | [ ] Yes [ ] NoIf yes, please provide detail information |
| Does your organization hold or does your organization intend to apply for any other environmental label on wooden flooring? | [ ] Yes [ ] NoIf yes, please specify which ones. |
| If yes, what were the motivations behind applying? |  |
| If not, what were the reasons for not considering applying? |  |
| Is your organization interested in applying for EU Ecolabel? | [ ] Yes [ ] No |
| If yes, please specify the main motivations. |  |
| **If not, what are the reasons for not considering applying?** |  |
| Can you provide any relevant Life Cycle Assessment or Environmental Product Declaration or any environmental related document? | [ ] Yes [ ] NoIf yes, please provide supplementary information.Information supplied will remain confidential and anonymous. |
| What is the key relevant legislation for wooden flooring in your country? | Please provide detailed information. |
| Do you agree to provide customers third- party verified environmental performance data about environmental performance of the final product (e.g. Global Warming Potential expressed in kg CO2 eq per functional unit) | [ ] Yes [ ] NoPlease provide supplementary information and assessment method. |
| Any other issues of relevance | Please provide supplementary information. |

## WFC DIFFUSION AND MARKET PENETRATION

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| WFC Market Data |
| **Market Share**Regardless of your company’s market share, please outline in the table below how you think the current market is split (in %, in terms of units sold) between the different products in the EU. Alternatively, if your knowledge is more specific to particular Member State(s), please specify which one(s) here:*Share of the WFC Market in the Named Regions (sold quantity)*

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| --- | --- | --- | --- | --- | --- | --- | --- |
| **Wooden Floor Covering,by Region(e.g. EU27 or specify country)** | **Year** | **Units Sold** | **Solid Woos** | **Laminate Wood** | **Mosaic Wood** | **Cork** | **Bamboo** |
|  |  | % |  |  |  |  |  |
|  |  | % |  |  |  |  |  |
|  |  | % |  |  |  |  |  |

*(Shares should be filled in along a given* ***row****. Please add rows/columns as required)* |

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| **Market Volumes**Which sources of information are you aware of, that could provide the following market volume data for wood, cork and bamboo flooring? *Please insert reference or website link if appropriate, and add further* ***rows*** *as required.*

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Source of information** | **Product type covered (e.g. Solid WFC, Cork parquet, …)** | **EU27 / Country** | **Year** | **Value (please specify units)** |
| **Production** | **Import** | **Export** | **Sales** |
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| **Market forecast**Are you able to provide any information on the WFC market forecast for 2015 and 2020 for EU27, individual Member States and/ or data for your own company?*We are interested in the most recent data you might have available. We prefer figures in units/pieces, but monetary data is welcome, too. Please email relevant documentation or any other information on sales and market size, to:* *info.ecolabelWFC@lcengineering.eu**.* |

## WFC MAIN ENVIRONMENTAL IMPACTS

Understanding the key stages of the manufacture and disposal of a floor covering is important for us to determine where the largest environmental impacts occur. This is best achieved through a lifecycle assessment (LCA) approach. The LCA study and the inventory of environmental data will help us to understand, for example:

• which stages/components are threating biodiversity, soil erosion, etc

• which stages/components are the most energy/co2 intensive

• which stages/components are the most pollutant due to the use of chemical agents (hazardous substances that can be released during the whole life cycle)

• which other factors need to be considered.

Although this study is expected to be conducted once the initial phase of the revision process is underway, input from stakeholders is now welcome.

This section revises one by one the current EU Ecolabel criteria for wooden floor coverings. First, the current EU ecolabel criterion is presented, secondly a brief comment on our concerns and issues we want to know your opinion on is included and finally a few general questions are given. **Please feel free to indicate any other issue of relevance or any other proposal.**

**Your opinion is highly appreciated and will be taken into consideration prior to the AHWG meetings.**

## COMMISSION DECISION

**of 26 November 2009**

**on establishing the ecological criteria for the award of the Community eco-label to hard**

**floor-coverings**

**(notified under document number C(2009) 9427)**

**(Text with EEA relevance)**

**(2010/18/EC)**

THE COMMISSION OF THE EUROPEAN COMMUNITIES,

[…]

HAS ADOPTED THIS DECISION:

**Article 1**

The product group ‘wooden floor coverings’ shall comprise wood- and plant-based coverings: including wood and timber coverings, laminate floorings, cork coverings and bamboo floorings which are made, for more than 90 % in mass (in the final product), from wood, wood powder and/or wood/plant-based material. It does not apply to wall coverings, where properly indicated, or coverings for external use or for coverings with a structural function.

This product group will not include any covering treated with biocidal products at any stage of the production process, except where those biocidal products are included in Annex IA to Directive 98/8/EC of the European Parliament and of the Council[[1]](#footnote-2) and where the active substance is authorised for the use in question according to Annex V to Directive 98/8/EC.

**Article 2**

In order to be awarded the Community Ecolabel under Regulation (EC) No 1980/2000, wooden floor coverings must fall within the product group ‘wooden floor coverings’ as defined in Article 1, and must comply with the ecological criteria set out in the Annex to this Decision

**Article 3**

The ecological criteria for the product group ‘wooden floor coverings’, as well as the related assessment and verification requirements, shall be valid for four years from the date of notification of this decision.

**Article 4**

For administrative purposes the code number assigned to the product group ‘wooden floor coverings’ shall be ‘35’.

**Article 5**

This Decision is addressed to the Member States.

ANNEX

FRAMEWORK

**The aims of the criteria**

These criteria aim in particular at promoting:

* the reduction of impacts on habitats and associated resources,
* the reduction of energy consumption,
* the reduction of discharges of toxic or otherwise polluting substances into the environment,
* the reduction of use of dangerous substances in the materials and in the finished products,
* safety and absence of risk to health in the living environment,
* information that will enable the consumer to use the product in an efficient way which minimises the whole environmental impact.

The criteria are set at levels that promote the labelling of coverings that are produced with low environmental impact.

**Assessment and verification requirements**

The specific assessment and verification requirements are indicated within each criterion.

This product group includes ‘**Wood and timber coverings’**, **‘Laminate floorings’**, ‘**Cork coverings’** and **‘Bamboo floorings’**; Wood and timber coverings are ‘wood floors or wall coverings made of one solid piece of wood that have tongue and groove sides or constructed from several wood plies that are glued together in a multilayer panel. A wood covering can be unfinished, and once installed sanded, then finished on site or pre-finished in a factory.’

**Wood and timber coverings** criteria can be applicable both for wall and floor coverings, if the production processes remain the same, using the same materials and the same manufacturing methods. The criteria are set for internal use only.

The industry producing wood floor coverings determines its technical position in the European Committee for Standardisation CEN/TC 112.

**Laminate floorings** are ‘rigid floor covering with a surface layer consisting of one or more thin sheets of a fibrous material (usually paper), impregnated with aminoplastic thermosetting resins (usually melamine), pressed or bonded on a substrate, normally finished with a backer’. Laminates coverings criteria can be applicable only for floor coverings and for indoor use. The industry producing laminate floor coverings determines its technical position in the European Committee for Standardisation CEN/TC 134.

**Cork coverings** are floor or wall coverings the main component of which is cork. The granulated cork is mixed with a binder, and then cured or several layers of cork (agglomerated/veneer) can be pressed together with glue. The cork coverings can be divided into natural cork tiles (the main component of which is agglomerated composition cork, intended to be used with a finish) and in engineered cork panels (consisting of several layers including a fibreboard the main component of which is agglomerated cork or has cork as technical solution, intended to be used with a finishing wear layer). Cork coverings criteria can be applicable both for wall and floor coverings, if the production processes remain the same, using the same materials and the same manufacturing methods. The criteria are set for indoor use only. The European ‘cork’ floor covering industry determines its technical position in the European Committee for Standardisation CEN/TC134.

**Bamboo floor covering** are made of bamboo in solid pieces or in agglomerates as a main component. Bamboo coverings criteria can be applicable only for floor coverings and for indoor use.

The functional unit, to which inputs and outputs should be related, is **1 m2 of finished product**.

Where appropriate, test methods other than those indicated for each criterion may be used if their equivalence is accepted by the competent body assessing the application.

Where possible, testing should be performed by appropriately accredited laboratories or laboratories that meet the general requirements expressed in standard EN ISO 17025.

Where appropriate, competent bodies may require supporting documentation and may carry out independent verifications.

WOODEN FLOOR COVERING Criteria

## RAW MATERIALS

All cork, bamboo and virgin wood must originate from forests that are managed so as to implement the principles and measures aimed at certifying sustainable forest management.

###  Sustainable forest management

“The producer shall have a policy for sustainable wood procurement and a system to trace and verify the origin of wood and tracking it from forest to the first reception point.

The origin of all wood shall be documented. The producer must ensure that all wood originate from legal sources. The wood shall not come from protected areas or areas in the official process of designation for protection, old growth forests and high conservation value forests defined in national stakeholder processes unless the purchases are clearly in line with the national conservation regulations.

* Until 30 June 2011, for wooden products placed on the market bearing the Ecolabel, at least 50 % of any solid wood and 20 % wood-based materials must originate either from sustainably managed forests which have been certified by independent third party schemes fulfilling the criteria listed in paragraph 15 of the Council Resolution of 15 December 1998 on a forestry strategy for the European Union (1) and further development thereof, or from recycled materials.
* From 1 July 2011, until 31 December 2012 for wooden products placed on the market bearing the Ecolabel at least 60% of any solid wood and 30 % wood-based materials must originate either from sustainably managed forests which have been certified by independent third party schemes fulfilling the criteria listed in paragraph 15 of the Council Resolution of 15 December 1998 on a forestry strategy for the European Union and further development thereof, or from recycled materials.
* From 1 January 2013, for wooden products placed on the market bearing the Ecolabel at least 70 % of any solid wood and 40 % wood-based materials must originate either from sustainably managed forests which have been certified by independent third party schemes fulfilling the criteria listed in paragraph 15 of the Council Resolution of 15 December 1998 on a forestry strategy for the European Union and further development thereof, or from recycled materials.

Assessment and verification: for meeting these conditions, the applicant shall demonstrate that any of their wooden eco-labelled products, when first placed on the market after the dates shown in the criterion will meet the appropriate level of certified wood. If this cannot be demonstrated the competent body will only issue the Ecolabel licence for the period for which compliance can be demonstrated. The applicant shall provide appropriate documentation from the wood supplier indicating the types, quantities and precise origins of wood used in the production of floor coverings. The applicant shall provide appropriate certificate(s) showing that the certification scheme correctly fulfils the requirements as laid down in paragraph 15 of the Council Resolution of 15 December 1998 on a forestry strategy for the European Union.

Definition: Wood-based materials means material made by binding with adhesives and/or glues one or more of the following materials: wood fibres, and/or stripped or sheared wood sheets, and/or wood residues from forest, plantations, sawn wood, residues from pulp/paper industry, and/or recycled wood. Wood-based materials comprise: hardboard, fibreboard, medium density fibreboard, particleboard, OSB (oriented strand board), plywood, and panels in solid wood. The term ‘wood-based material’ also refers to composite materials made from wood-based panels coated by plastics, or laminated plastics, or metals, or other coating materials and finished/semi-finished wood-based panels.

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| Criterion 1.1 LCE comment |
| The **existing definition of the wooden floor coverings** (described above) may not be completely appropriate to all/most important wooden floor covering types currently available on the market. New wooden floor coverings may exist, being under development or even already dominate the market that are not included in the above mentioned four types of floor coverings or under **the minimum requirement of wood material (90% in mass).**In addition, requirements regarding the content of wood (solid wood or wood-based) arising from sustainable managed forests may need to be updated. Other Ecolabel schemes (e.g. Ecolabel for copying and graphic paper) specifies a stricter criterion requiring that 100% of the virgin fibres must be sourced from forests which are part of a third party certification scheme for sustainable management. Regarding this updating, it is also to be decided if the possible rising should be updated gradually (e.g. having three steps (e.g. an update per year) or once at a time.  |

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| Questions to stakeholders and issues for consideration regarding criterion 1 |
| 1. Do you agree that the current criteria should be modified?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. Is the current definition and scope appropriate and suitable for this product category? Does it reflect the current and coming market conditions?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. Is any relevant wooden floor covering excluded by this definition?
 | [ ] Yes [ ] NoIf yes, please provide the name and characteristics of the excluded wooden floor coverings |
| 1. How much is the wood or wood-based material content in your products?
 | Please provide information or comments. |
| 1. Do you consider the current formulation of assessment and verification procedure (listed above) is sufficient and appropriate?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. Do you agree with removing this sentence *“The producer must ensure that all wood originate from legal sources.”* from the criteria 1.1 due to its redundancy?
 | [ ] Yes [ ] NoPlease justify your answer. |
| 1. As an average, what proportion of wood in wooden flooring, according to your knowledge, arises from third party certified sustainable forests?
 | Please provide supplementary information, if available. |
| 1. Which is your wood supplier certification regarding the chain of custody (PEFC, FSC, etc…)?
 | Please provide supplementary information. |
| 1. Do you agree that the chain of custody is a valid verification tool on sustainable managed forests?
 | [ ] Yes [ ] NoPlease justify your answer. |
| 1. Up to what extent could it be considered feasible to increase the proportion of certified wood in wooden floorings?
 | Please provide your proposal and explanation. |
| 1. Is it feasible to extent set these kinds of criteria to other biomass materials?
 | [ ] Yes [ ] NoPlease provide supplementary information and examples of desired wooden materials (hemp, willow, etc…), if available. |
| 1. In your opinion, is it necessary to develop any other new requirement for this criterion?
 | Please provide supplementary information. |

### Recycled wood and plant materials (for laminate flooring and multilayer wood coverings)

Post-consumer wood, chips or fibres applied in the production of wood-based materials (input), shall at least comply with the provisions in the EPF industry standard, as reported in paragraph 6 of document ‘EPF standard for delivery conditions of recycled wood’ of 24 October 2002.

The total amount of the recycled material shall comply with the limits indicated in table below:

Assessment and verification: a declaration shall be provided that recycled wood or plant materials comply with limit values as laid down in text. If it can be proved that the substances indicated have not been used in any previous preparation or treatment, the application of test to demonstrate compliance with this requirement can be avoided.

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| Criterion 1.2 LCE comment |
| Decide weather is better to update the old limits. If so, decide whether is better to do it:* Gradually
* Once at a time
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| Questions to stakeholders and issues for consideration regarding criterion 1 |
| 1. Do you agree that the present criteria should be modified?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. Do you consider the current formulation of assessment and verification procedure (listed above) sufficient and appropriate?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. Do you agree to add a minimum percentage quantity of recycled wood and/or plant material as input?
 | [ ] Yes [ ] NoPlease justify your answer. |
| 1. In your opinion, is it necessary to develop any other new requirement for this criterion?
 | Please provide supplementary information. |

### Impregnating substances and preservatives

Wooden flooring shall not be impregnated.

Solid wood, after logging, shall not be treated with substances or preparations containing substances that are included in any of the following lists:

* WHO recommended classification of pesticides by hazard classified as class 1a (extremely hazardous);
* WHO recommended classification of pesticides by hazard classified as class 1b (highly hazardous).

Moreover, the treatment of wood shall be in accordance with the provisions of Council Directive 79/117/EEC[[2]](#footnote-3)and Council Directive 76/769/EEC[[3]](#footnote-4).

Assessment and verification: the applicant shall provide a declaration showing compliance to this criterion, a list of the substances which have been used and a data sheet for each of them.

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| Criterion 1.3 LCE comment |
| At present no EU Ecolabel wooden floor covering criteria directly limit the use of impregnating substances nd preservatives. However, changes may be required to criteria so that they better reflect the legislative framework, EU Ecolabel regulation, technical feasibility and market acceptance. Decide if it is better to exclude all impregnated wooden flooring at all. |

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| Questions to stakeholders and issues for consideration regarding criterion 1 |
| 1. Do you agree that the present criteria should be modified?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. Which impregnating substances and preservatives are present in wooden floor covering?
 | Please provide supplementary information. |
| 1. Do you consider the current formulation of assessment and verification procedure (listed above) sufficient and appropriate?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. Is the request of providing the data sheet of each substance used in the final product preventing manufactures from applying for the EU Ecolabel?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. In your opinion, is it necessary to develop any other new requirement for this criterion?
 | Please provide supplementary information. |

### Genetically modified wood

The product shall not contain GMO wood.

Assessment and verification: the applicant shall provide a declaration that no GMO wood has been used.

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| Criterion 1.4 LCE comment |
| Decide if it is better to continue excluding GMO Wood. |

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| Questions to stakeholders and issues for consideration regarding criterion 1 |
| 1. Do you agree that the present criteria should be modified?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. What is your opinion regarding the restriction on the use of GMO wood in this product group?
 | Please explain, if applicable. |
| 1. In your opinion, is it necessary to develop any other new requirement for this criterion?
 | Please provide supplementary information. |

## USE OF DANGEROUS SUBSTANCES

### Dangerous substances for the raw wood and plant treatments

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| Criterion 2.1 LCE comment  |
| Generally speaking, the most relevant the environmental impacts of wooden floor coverings are associated with the production and treatment of raw materials used in the manufacturing and the use of glue and other adhesives during the of the installation of the flooring itself. The main impact related to the use of hazardous substances is the eutrophication of surface and ground water caused by release during production, use or disposal of these substances. Therefore, in this revision we should focus on those environmental aspects that are associated with the main raw materials that are being used in wooden flooring and their finishing treatments. According to this, criteria should be defined to reduce the environmental impact in relation to the use of hazardous substances. Restrictions on substances and/or mixtures meeting the criteria for classification with certain hazard statements in accordance with CLP Regulation (EC) No 1272/2008 and restriction of substances from the candidate list of substances of very high concern (SVHC) (compliance with the new EU Ecolabel Regulation EC/66/2010 article 6(6)) have to be taken into account. The following questions and issues are proposed to be considered for the revision of the current criterion. |

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| Questions to stakeholders and issues for consideration regarding criterion 2 |
| 1. Is this criterion still valid regarding the current production methods?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. Which substances or functional groups of substances contained in WFC products are of special concern? Could you indicate them?
 | Please indicate and, if possible, provide supplementary information. |
| 1. A. Do you have developed an inventory of substances (and their concentration levels) found in your products?

B. Have you screened them and/or any components using CLP hazard classifications and/or DSD risk phrases? | [ ] Yes [ ] NoIf yes, please provide supplementary information.[ ] Yes [ ] NoIf yes, please provide supplementary information. |
| 1. If you answer “yes” to question 3:

Would you be willing to share further information and experience with us on hazardous substance screening?  | [ ] Yes [ ] NoIf yes, please provide supplementary information. |
| 1. Which difficulties did you face regarding an inventory of hazardous substances in your products?
 | Please indicate and, if possible, provide supplementary information. |
| 1. Is there any substance classified as of special concern that would be totally restricted by this list and has no substitutes with better environmental performance?
 | Please indicate and, if possible, provide supplementary information. |
| 1. Are there any information gaps?
 | Please indicate and, if possible, provide supplementary information. |

### Dangerous substances in the coating and surface treatments

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| Criterion 2.2 LCE comment |
| About coating and surface treatments, the key environmental and health impacts are associated with the use of some potentially dangerous agents such as heavy metals, phthalates and halogenated organic flame retardants, some of which are classified with health and environmental hazard statements. EU directives and regulations must be updated: Directives 67/548/EEC and 1999/45/EC have been replaced and amended by CLP N° 1272/2008; Directive 1999/13/EC has been amended by Directive 2008/112/EC.Hazardous substances associated with the presence of solvents should be further investigated in order to consider if new restrictions are necessary or decide whether to maintain or modify the current limits. |

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| Questions to stakeholders and issues for consideration regarding criterion 2 |
| 1. Do you consider the current formulation of assessment and verification procedure sufficient and appropriate?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. Up to what extent do you consider feasible to decrease VOCs content in adhesives?
 | Please provide supplementary information. |
| 1. Up to what extent is considered feasible to limit the content of free formaldehyde from untreated raw wood-based materials?
 | Please provide supplementary information, if available. |
| 1. Up to what extent do you consider feasible to limit the content of free formaldehyde in recycled wood?
 | Please provide supplementary information. |
| 1. Do you have additional proposals regarding revision of this criterion?
 | If yes, please explain briefly. |
| 1. In your opinion, is it necessary to develop any other new requirement for this criterion?
 | Please provide supplementary information. |

## PRODUCTION PROCESS

### Energy consumption

The energy consumption shall be calculated as the process energy used for the production of the coverings.

The process energy, calculated as indicated in the Technical Appendix, shall exceed the following limits (P = scoring point):

 *Assessment and verification*: the applicant shall calculate the Energy consumption of the production process according to the Technical Appendix instructions providing the related results and supporting documentation.

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| Criterion 3.1 LCE comment |
| The production of wooden floor coverings is energy intensive. Reducing the energy demand and in particular the fossil fuel demand we will lower their associated carbon intensity and air pollutant emissions. Carbon impacts are also linked to purchase of electricity from the grid or the self-production. This aspect makes the fuel mix and electricity generation efficiency of the country where the manufacturer is located important. Decide whether to maintain or modify the current limits. |

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| Questions to stakeholders and issues for consideration regarding criterion 3 |
| 1. Do you agree that the present criteria should be modified?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. Do you agree to revise and eventually split the P value for laminate floor coverings?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. Do you consider the current formulation of assessment and verification procedure (listed above) sufficient and appropriate?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. Are you aware if the energy consumption has been extensively assessed for wooden floor production? Which studies on energy consumption or other LCA issues can be regarded as relevant?
 | [ ] Yes [ ] NoIf yes, please provide supplementary information. |
| 1. Is there any methodology used by flooring industry in order to determine energy consumption? Are there any thresholds/requirements recommended by industry?
 | [ ] Yes [ ] NoIf yes, please provide supplementary information. |
| 1. Could stricter maximum energy consumption requirements have negative effects on other environmental impacts due to for example a restricted choice of materials or specific manufacturing processes?
 | [ ] Yes [ ] NoIf yes, please provide supplementary information. |
| 1. In your opinion, is it necessary to develop any other new requirement for this criterion?
 | Please provide supplementary information. |

### Waste management

The applicant shall provide an appropriate documentation on the procedures adopted for the recovery of the by-products originated from the process. The applicant shall provide a report including the following information:

* kind and quantity of waste recovered,
* kind of disposal,
* information about the reuse (internally or externally to the production process) of waste and secondary materials in the production of new products.

*Assessment and verification*: the applicant shall provide appropriate documentation based on, for example, mass balance sheets and/or environmental reporting systems showing the rates of recovery achieved whether externally or internally, for example, by means of recycling, reuse or reclamation/regeneration.

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| Criterion 3.2 LCE comment |
| The environmental impact caused by wooden floor coverings at the end of their life significantly varies depending on the chosen materials for the production and future scenario. Therefore information about the kind of quantity of waste recovered, kind of disposal and its possible reuse, recycled or revalorization can help us to reduce the overall environmental impact.Decide whether to maintain or modify the current limits. |

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| Questions to stakeholders and issues for consideration regarding criterion 3 |
| 1. Do you agree that the present criteria should be to modified?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. Do you consider the current formulation of assessment and verification procedure (listed above) sufficient and appropriate?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. Up to what extent do you consider feasible to recover the by-products originated from the process?
 | Please justify your answer and provide a feasible percentage per the main by-products. |
| 1. What other waste treatment options (e.g. recycling) are available and appropriate?

Do you consider appropriate introducing new criteria regarding waste management in floor covering production, e.g. "for waste from production that has energy content greater than 10 MJ/kg must be recycled, reintroducing it into production or used as a source of energy"?(suggested criteria from Nordic labelling) | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. In your opinion, is it necessary to develop any other new requirement for this criterion
 | Please provide supplementary information. |

## USE PHASE

### Release of dangerous substances

The release of formaldehyde from the panels of cork, bamboo or wood fibres constituting the covering shall not exceed 0,05 mg/m3.

*Assessment and verification*: the applicant shall provide appropriate documentation based on test following the chamber method according to EN 717-1 method.

### Volatile organic compounds (VOC)

The finished products must not exceed the following emission values:

*Assessment and verification*: the applicant shall present a test certificate according to emission tests prEN 15052 or EN ISO 16000-9.

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| Criterion 4.1 LCE comment |
| Decide whether to maintain or modify the current limits. |

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| Questions to stakeholders and issues for consideration regarding criterion 4 |
| 1. Do you agree that the present criteria should be modified?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. Do you consider the current formulation of assessment and verification procedure (listed above) sufficient and appropriate?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. Up to what extent do you consider feasible to decrease formaldehyde release in the use phase?
 | Please provide supplementary information. |
| 1. Up to what extent do you consider feasible to decrease TVOCs content in the use phase?
 | Please provide supplementary information. |
| 1. In your opinion, is it necessary to develop any other new requirement for this criterion?
 | Please provide supplementary information. |

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## PACKAGING

Packaging must be made out of one of the following:

* easily recyclable material,
* materials taken from renewable resources,
* materials intended to be reusable.

*Assessment and verification*: a description of the product packaging shall be provided on application, together with a corresponding declaration of compliance with this criterion.

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| Criterion 5 LCE comment |
| Decide whether to maintain or modify the current approach. |

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| Questions to stakeholders and issues for consideration regarding criterion 5 |
| 1. Do you agree that the present criteria should be modified?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. Do you consider the current formulation of assessment and verification procedure (listed above) sufficient and appropriate?
 | [ ] Yes [ ] NoPlease justify your answer and provide additional information or comments. |
| 1. Up to what extent do you consider feasible to reduce packaging materials?
 | Please provide supplementary information. |
| 1. Up to what extent do you consider feasible to increase recycled materials content in packaging?
 | Please provide supplementary information. |
| 1. Up to what extent do you consider feasible to increase the reusability of packaging materials?
 | Please provide supplementary information and suggestion on possible uses. |
| 1. Do you agree to introduce a new criterion on the maximum packaging quantity to be used in relation to the mass of the final product?
 | [ ] Yes [ ] NoPlease justify your answer and if yes, provide a feasible percentage. |
| 1. In your opinion, is it necessary to develop any other new requirement for this criterion?
 | Please provide supplementary information. |

## FITNESS FOR USE

The product shall be fit for use. This evidence may include data from appropriate ISO, CEN or equivalent test methods, such as national procedures.

*Assessment and verification*: details of the test procedures and results shall be provided, together with a declaration that the product is fit for use based on all other information about the best application by the end-user. According to Directive 89/106/EEC[[4]](#footnote-5) a product is presumed to be fit for use if it conforms to a harmonised standard, a European technical approval or a non-harmonised technical specification recognised at Community level. The EC conformity mark ‘CE’ for construction products provides producers with an attestation of conformity easily recognisable and may be considered as sufficient in this context.

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| Criterion 6: LCE comments |
| The durability of wooden floor coverings is linked to several topics highlighted in the current set of criteria such as the waste treatment and resources consumption (e.g. energy, materials, etc). The lifetime of a floor covering is expected to be between 10-15 years depending on the quality and use. However, on the other side, floor coverings can be changed due to fashion and decoration reasons in a shorter period of time.This is estimated by resistant tests in accordance with the standard EN 13329-Annex E. The current assessment and verification procedure does not include this standard to prove this criterion is met. Decide whether to maintain or modify the current approach.It is necessary to add the EN durability standard developed to assess durability (EN 13329 – Annex E) in the *Assessment and verification* part of the Criteria 6.  |

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| Questions to stakeholders and issues for consideration regarding criterion 6 |
| 1. Do you agree in setting additional requirements in criterion 6 regarding ergonomics?
 | [ ] Yes [ ] NoIf yes, please provide your proposal and supplementary information. |
| 1. If yes, do you have any proposals on the aspects that shall be additionally covered and what verification and which verification and assessment procedure could be proposed?
 | Please specify, is possible, for the aspects to be covered and possible verification and assessment procedures |
| 1. It is feasible to set up a minimum guaranteed durability (in years) after manufacturing?
 | [ ] Yes [ ] NoIf yes, do you have any proposals how to formulate such a criterion? Could you describe it? |
| 1. Which is the average lifespan for wooden floor covering?
 | Please specify, is possible, for various kinds of floorings. |
| 1. In your opinion, is it necessary to develop any other new requirement for this criterion?
 | Please provide supplementary information. |

## CONSUMER INFORMATION

The product shall be sold with relevant user information, which provides advice on the product’s proper and best general and technical use as well as its maintenance. It shall bear the following information on the packaging and/or on documentation accompanying the product:

1. information that the product has been awarded the EU Ecolabel together with a brief yet specific explanation as to what this means in addition to the general information provided by box 2 of the logo;
2. recommendations for the use and maintenance of the product. This information should highlight all relevant instructions particularly referring to the maintenance and use of products. As appropriate, reference should be made to the features of the product’s use under difficult conditions, for example, water absorption, stain resistance, resistance to chemicals, necessary preparation of the underlying surface, cleaning instructions and recommended types of cleaning agents and cleaning intervals. The information should also include any possible indication on the product’s potential life expectancy in technical terms, either as an average or as a range value;
3. an indication of the route of recycling or disposal (explanation in order to give the consumer information about the high possible performance of such a product);
4. information on the EU Ecolabel and its related product groups, including the following text (or equivalent): ‘for more information visit the EU Ecolabel website: <http://ec.europa.eu/environment/ecolabel/>’.

*Assessment and verification*: the applicant shall provide a sample of the packaging and/or texts enclosed.

## INFORMATION APPEARING ON THE ECOLABEL

Box 2 of the Ecolabel shall contain the following text:

* sustainable managed forests and reduced impact on habitats,
* hazardous substance restricted,
* production process energy saving,
* lower risk to health in the living environment.

## TECHNICAL APPENDIX for wood and plant-based coverings

### ENERGY CONSUMPTION CALCULATION

Energy consumption is calculated as an annual average of the energy consumed during the production process (excluding premises heating) from the raw material in bulk to the finished covering. This means, for example, that the energy calculation for wood- and plant-based products shall be measured from the input of the raw material into the factory until the finishing operations, packaging included.

The calculation shall not include the energy content of the raw material (i.e. feedstock energy).

The energy required to manufacture adhesives and varnish or coatings shall not be included in the calculations.

The unit chosen for the calculations is the MJ/m2 .

Electricity consumption refers to electricity purchased from an external supplier.

If the producer has an energy surplus that is sold as electricity, steam or heat, the quantity sold can be deducted from the fuel consumption. Only the fuel that is actually used in floor covering production shall be included in the calculations.

The energy contents of various fuels are provided in the following table:


### [APPENDIX I](#_top)

Hazard statement according to CLP 1272/2008 for hazardous substances.

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| Hazard statement according to CLP 1272/2008/EEC | Associated risk phrases according to Directive 67/548/EEC |
| H300 Fatal if swallowed | R28 |
| H301 Toxic if swallowed | R25 |
| H304 May be fatal if swallowed and enters airways | R65 |
| H310 Fatal in contact with skin | R65 |
| H311 Toxic in contact with skin | R65 |
| H317 May cause allergic skin reaction | R43 |
| H330 Fatal if inhaled | R23; R26 |
| H331 Toxic if inhaled | R23 |
| H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled | R42 |
| H340 May cause genetic defects | R23 |
| H341 Suspected of causing genetic defects | R68 |
| H350 May cause cancer | R45 |
| H350i May cause cancer by inhalation | R49 |
| H351 Suspected of causing cancer | R40 |
| H360F May damage fertility | R60 |
| H360D May damage the unborn child | R61 |
| H360FD May damage fertility. May damage the unborn child | R60-61 |
| H360Fd May damage fertility. Suspected of damaging the unborn child | R60-63 |
| H360Df May damage the unborn child. Suspected of damaging fertility | R61-62 |
| H361f Suspected of damaging fertility | R62 |
| H361d Suspected of damaging the unborn child | R63 |
| H361fd Suspected of damaging fertility. Suspected of damaging the unborn child | R62-63 |
| H362 May cause harm to breast-fed children | R64 |
| H370 Causes damage to organs | R39/23; R39/24; R39/25; R39/26; R39/27; R39/28 |
| H371 May cause damage to organs | R68/20; R68/21; R68/22 |
| H372 Causes damage to organs through prolonged or repeated exposure | R48/25; R48/24; R48/23 |
| H373 May cause damage to organs through prolonged or repeated exposure | R48/20; R48/21; R48/22 |
| H400 Very toxic to aquatic life | R50 |
| H410 Very toxic to aquatic life with long-lasting effects | R50-53 |
| H411 Toxic to aquatic life with long-lasting effects | R51-53 |
| H412 Harmful to aquatic life with long-lasting effects | R52-53 |
| H413 May cause long-lasting harmful effects to aquatic life | R53 |
| EUH059 Hazardous to the ozone layer | R59 |
| EUH029 Contact with water liberates toxic gas | R29 |
| EUH031 Contact with acids liberates toxic gas | R31 |
| EUH032 Contact with acids liberates very toxic gas | R32 |
| EUH059 Hazardous to the ozone layer | R59 |
| EUH070 Toxic by eye contact | R39-41 |

1. OJ L 123, 24.4.1998, p. 1. [↑](#footnote-ref-2)
2. OJ L 33, 8.2.1979, p. 36. [↑](#footnote-ref-3)
3. OJ L 262, 27.9.1976, p. 201. [↑](#footnote-ref-4)
4. OJ L 40, 11.2.1989, p. 12. [↑](#footnote-ref-5)