



BEUC AND EEB COMMENTS ON THE FIRST DRAFT CRITERIA PROPOSAL (20 FEBRUARY 2008) ON THE ECOLABEL TO COVERINGS

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BEUC and EEB
10th March 2008

General comments

Previous to commenting on some of the criteria suggested for hard floor coverings, and textiles and wood based floor coverings we would like to bring to the attention of the group several general considerations for which we would like that a discussion takes place during the ad hoc working group.

Scope

EEB and BEUC cannot support the decision to reduce the scope of the soft floor coverings product group to only wood based floor coverings and textiles floor coverings. The ecolabel for coverings should be applied to all necessary applications of floorings in private housings. Thus in addition resilient floorings e.g. linoleum should be taken into account.

BEUC and EEB in the first AHWG-meeting had asked for data about the market share of eco-labelled products in the different countries. In addition, the market share of well established labels such as the Blue Engel should be analysed in order to find out if and for what products an additional label is needed in order to provide ecolabeled products for every floor application in private housings. These data have not been presented.

Quality of LCA data used for criteria development

We are concerned about lack of fundamental background information in terms of life cycle assessment data which can support criteria development decisions and can help to discriminate environmental performances within the different products groups. This is particularly worrying for wood floor coverings and textiles floor coverings where the set of criteria proposed do not reflect the state of the art in LCA of these product groups. The actual version integrates a translation of the national ecolabels criteria which are dedicated to indoor air quality, but - especially for textile floorings - lacks LCA supporting information which was asked for by the 1st AHGW-meeting.

In the case of HFC, LCA-data used for criteria development are poor and not presented in a transparent and provable manner. It appears that the used data have been compiled from different sources and it is unclear whether the presented data have been subjected to any quality cross check.

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The presented report covers only public available information to compile a first set of data. In the discussion in the 1st AHGW-meeting industry as well as the NGOs stressed that the data do not represent the state of the art (e. g.: the in use phase laminates were calculated to be about 50 years while practical experiences indicate an average durability of laminates up to about 15 years). It was doubted that the presented data really are sufficient for identifying any hot spots or relevant fields for Ecolabel activities aiming for the identification of the 10-20% products within a product group showing the best environmental performance.

The discussion worked out that the conclusions for soft floor coverings presented in the report are based on a much too weak data base and therefore should be carefully revised. However, this may be due to a principle lack of public data available. If this is the case, it should be stated in the background document in order to develop strategies to overcome these deficits.

On this basis it is difficult to understand how the ad hoc working group will be able to verify the values indicated in the draft proposal criteria for wood and textiles floor coverings in terms of their applicability and their validity of the LCA results.

In addition, we consider that the intended LCA-approach has not been applied in a convincing way, when deriving the respective criteria. In most aspects the presented outcome is linked to end of pipe criteria like emissions but not to real LCA-performance data derived from the most efficient and environmental sound ways of production.

Furthermore, for many criteria the LCA-boundaries are not well defined:

First example: It is unclear how to assess the conformity to extraction criteria for production sites in e. g. China or Turkey. This can also be proofed for Grey Energy linked to transport which of course is an important environmental impact factor for any material which consists out of materials from overseas.

Second example: If - like stated in the final report (p. 95) - the impact of cleaning and premature disposal - is of essential importance for the environmental performance of specific flooring, any proper LCA should address these factors in an appropriate way. This also is due for the impact of maintenance, which e. g. for wood floorings is the essential factor in enhancing their durability up to more than a hundred years.

Hard coverings

Ref. 1.1 - Extraction management

BEUC and EEB ask for:

Verification that there is an actual need to lower the range limit for waste water recycling from 80 to 65%.

Which is the percentage of quarries that are not able to fulfill the existing hurdle of 80%?

Are there other sources which prove the need for lowering the existing requirement?

BEUC and EEB would like to know why:

The proposed lowering of the visual impact criteria to an exclusion hurdle of 20% has not been applied. There is no information in the reports documenting why the proposed requirement has been skipped.

A reference to the EIA Directive - Environmental Impact Assessment is still missing.

Ref. 2 - Raw materials selection 2.1 Absence of risk phrases ...

BEUC and EEB ask for:

Including the risk phrases **R40, R49, R53-R59, R62, R63, R68**
(as applied in criteria for wood-based & textile floor coverings)

BEUC and EEB point of view is that:

It is not acceptable that the dangerous substances criterion should not apply to closed loop recycled materials.

Ref. 2.2 Limitation of the presence of some substances in additives

BEUC and EEB would like to know why:

The proposal to lower the limit for lead and the proposal of the Danish C.B. to lower the Cadmium limit have not been discussed. The documents don't give any argumentation why the existing thresholds can't be lowered.

Ref. 4 - Production Process (for natural processed products only)
4.1 Energy consumption

BEUC and EEB point of view is that:

The functional unit used for the process energy requirement (PER) limit should be changed to **MJ/kg** as e.g. used for the ERF limit.

In fact the total energy consumption according to the life cycle (raw material extraction, transport, production process ...) would be the relevant criterion to identify the best products regarding energy consumption. This is as well relevant if CO₂ emissions should be applied as additional information.

Ref. 4.3 - Emissions to air

BEUC and EEB would like to know why:

The proposed inclusion of limits for HCl and CO as implemented by several European countries and the proposed lowering of the HF limit in order to get a more advanced standard regarding the BAT have not been considered in the documents.

Ref. 5.1 - Recovery of waste

BEUC and EEB would like to know why:

The proposal to raise the minimum recovery percentage to 90% of weight has not been considered.

Due to the late distribution of the Draft criteria and Background document a detailed comment on the proposed criteria on wood based and textile floor coverings is not yet possible. Below BEUC and EEB would like to point out some issues which are important for discussion at the ad hoc working group.

Wood based floor coverings

Ref. 1. Raw materials

BEUC and EEB point of view is that:

We cannot support the proposed criteria for solid wood and wood based materials since they have a very low ambition level and lack behind national procurement policies currently being implemented and developed in countries such as the UK, Belgium, France, the Netherlands and Germany.

The EU Ecolabel has to represent the best environmental performance products. The minimum input on wood originating from sustainable sources should be at least 70% both for solid wood and for wood-based materials. The differentiation between the two thresholds is not justified and the 40% level would be lower than what is required by national governments across the EU. The 70% threshold it is in line with what is accepted by most forest certification schemes including FSC and PEFC and should be the level of reference. Furthermore, procurement managers and professional organisations contacted through the criteria development process of the EU Ecolabel for wooden furniture have stated that 70% of wood coming from sustainable managed forests is not a big challenge to achieve with the present share of certified forest in Europe.

Furthermore, it is not understandable why there is no inclusion of criteria to prohibit the use of controversial sources as done in the case of the EU Ecolabel for wooden furniture. Without this prohibition there is a serious risk that products with the EU ecolabel consist of illegally harvested timber or timber that has been harvested in violation of local peoples' rights.

We therefore require that only certified products by credible and independent certification schemes are accepted. This is needed to ensure that as a minimum 70% of the wood originates from legal and sustainable sources and that no wood from controversial sources has been used. This will simplify the requirements for assessment and verification of compliance, since all credible certification schemes already have a threshold of 70% for timber originating from sustainable sources and provisions to ensure that the remaining does not come from controversial sources.

Increasing the request for the level of certified wood to 100% is therefore justified and further substantiated through data and facts provided in the Forest Product Annual Market Review 2005/2006 (UNECE, 2006), which reflect that 50% of the EU 25 forests are certified. The report also shows that the current potential supply of

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certified forest products exceed actual demands in many markets (UNECE, 2006: p. 103). .

Finally, to ensure that the EU Ecolabel does not become irrelevant it has to ensure that only credible and independent forest certification schemes will be allowed. In this regard reference to the criteria listed in paragraph 15 of the Council Resolution of 15 December on a Forestry Strategy for the EU and further development is not strong enough. The principles and measures of sustainable forest management need to be established. We would like to refer to the set of principles already provided by EEB and BEUC for different product groups (See appendix).

Ref. 2. Use of dangerous substances

BEUC and EEB point of view is that:

It is necessary to include specific criteria for coatings applied on wood-based floor coverings.

The formaldehyde emissions of any wood-based floor covering should be limited to 0,05 ppm (50% of emission limit E1).

VOC emissions of wood-based floor coverings including those resulting from adhesives, coatings should be limited as in comparable national labels. For example the German Blue Angel (RAL UZ 38) limits the VOC emission values (compounds with boiling points 50-250°C) for plane two-dimensional products to a final value of 0,3 mg/m³ (after 28 days), VOC Compounds with boiling points > 250°C are in addition limited to 0,1 mg/m³ (after 28 days).

It seems as well necessary to limit the VOC contents of Liquid Coating Systems used to the following limits - 250 g/l VOC for plane two-dimensional products/materials (refers to criteria used by the German Blue Angel RAL UZ 38).

The VOC-emissions from the production side also should be taken into account and should be in accordance to the respective European directive.

Textile floor coverings

BEUC and EEB point of view is that:

Criteria on socially acceptable production conditions should be included.

Biocides and flame retardants should not be used in textile floor coverings.

Criteria on odor should be included, e.g. based on a smell test established by the GUT association.

The LCA-criteria for the production phase and the after-use phase are lacking.

END

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Appendix

Credible independent third party certification criteria

Credible Certification should be defined as a process by which a third (independent) party gives written assurance that a product, process or service conforms to specified requirements. A forest certificate has to attest that the forest management reaches the specified thresholds and has to document the origin of timber. As such, and in order to provide a credible product label, it has to have two components:

1. forest auditing: inspection of forest management on-the-ground against specified standards;
2. product certification: chain-of-custody monitoring of a timber product from the forest to the consumer.

All forest certification systems have to fulfill the following basic principles and minimum requirements:

1. Achieve the two main objectives:
 - a) to improve forest management,
 - b) to ensure market access for certified wood products
3. Have national or sub-national-level quantitative and qualitative forestry standards compatible with generally accepted international principles and criteria
4. Be embedded into a global framework that provides internationally recognized, applicable and equitable standards
5. Ensure meaningful and equitable participation of a broad range of stakeholders in governance and standard setting
6. Certification decisions free of conflict of interest from parties with vested interests
7. Be voluntary
8. Ensure independent third party assessment
9. Provide objective, comprehensive, independent and measurable performance-based standards - both environmental and social
10. Be fully transparent to the parties involved and the public
11. Ensure certification at the management unit level but remain cost-effective and make all efforts to be equitable to small forest owners
12. Ensure active commitment of the managers/owners of the certified unit
13. Be acceptable to a large range of involved parties and credible to consumers, social and conservation NGOs
14. Be market driven