

Position on ECO-LABEL

1 Executive summary

EuroWindowoor supports sustainable construction, however is against the principle of ECO labelling Type I and Type II for fenestration products. The Fenestration industry is able to deliver relevant information in the form of Environmental Product Declarations (EPD, ECO labelling Type III) based on LCA methodology (ISO 14040) and on harmonised European standards (CEN/TC 350).

2 Background

"Ecolabelling" is a voluntary method of environmental performance certification and labelling that is practised around the world. An "ecolabel" is a label which identifies overall environmental preference of a product or service within a specific product/service category based on life cycle considerations. In contrast to "green" symbols or claim statements developed by manufacturers and service providers, an ecolabel is awarded by an impartial third-party in relation to certain products or services that are independently determined to meet environmental leadership criteria.

3 Environmental performance labels and declarations

There are many different voluntary (and mandatory) environmental performance labels and declarations. The International Organization for Standardization (ISO) has identified three broad types of voluntary labels, with ecolabelling fitting under the Type I designation.

Voluntary Environmental Performance Labelling -- ISO Definitions

Type I -- a voluntary, multiple-criteria based, third party program that awards a license that authorizes the use of environmental labels on products indicating overall environmental preferability of a product within a particular product category based on life cycle considerations

Type II -- informative environmental self-declaration claims

Type III -- voluntary programs that provide quantified environmental data of a product, under pre-set categories of parameters set by a qualified third party and based on life cycle assessment, and verified by that or another qualified third party

Further, the ISO has identified that these labels share a common goal, which is:

"...through communication of verifiable and accurate information, that is not misleading, on environmental aspects of products and services, to encourage the demand for and supply of those products and services that cause less stress on the environment, thereby stimulating the potential for market-driven continuous environmental improvement."

4 EU and Eco labels

The European Parliament adopted a first reading agreement on the voluntary EU Ecolabel ("EU flower") system for environment-friendly products to become less costly and bureaucratic to use. The label has so far been awarded to over 3,000 products such as detergents, paper and shoes. The resolution was adopted with 633 votes in favor to 18 against.

The overall objective of the proposed regulation is to promote products with a reduced environmental impact through the use of a voluntary scheme, the Ecolabel scheme.

The proposed regulation sets general requirements for the development of the Ecolabel criteria for any goods or services which are supplied for distribution, consumption or use on the Community market. The criteria themselves will not be determined by the regulation, but by subsequent decisions, for each product group (laundry detergents, soaps and shampoos, tissue paper, camp site service, etc.)

5 Use of Eco labels

The roots of ecolabelling can be found in growing global concern for environmental protection on the part of governments, businesses and the public. As businesses have come to recognize that environmental concerns may be translated into a market advantage for certain products and services, various environmental declarations/claims/labels have emerged on products and with respect to services in the marketplace (e.g. natural, recyclable, eco-friendly, low energy, recycled content, etc.). While these have attracted consumers looking for ways to reduce adverse environmental impacts through their purchasing choices, they have also led to some confusion and scepticism on the part of consumers.

Without guiding standards and investigation by an independent third party, consumers may not be certain that the companies' assertions guarantee that each labelled product or service is an environmentally preferable alternative. This concern with credibility and impartiality has led to the formation of both private and public organizations providing third-party labelling. In many instances, such labelling has taken the form of ecolabels awarded to products approved by an ecolabelling program operated at a national or regional (i.e. multi-countries) level.

6 Eco Labels and the Fenestration Industry

The vast majority of fenestration sales are business to business and for new build or major refurbishment of existing buildings; therefore there are alternative methods to demonstrate sustainability and environmental friendliness of a product. The current proposals do not add anything to the industry.

European Harmonised Standards are already in existence; if additional declarations are required for sustainability these should be included within a future amendment of the product standard. This approach has the following advantages:

- Reduces potential conflict between standards
- Reduces costs for the manufacturer and in turn the end consumer
- This will be part of a manufacturers legal declaration for a product ensuring details are correct.
- Reduces the number of schemes and declarations across Europe which confuses the market place.

EuroWindowdoor position, 2nd March 2010

- The sustainability / eco declaration will be relevant to the particular product and not a general requirement i.e. the requirements for fenestration compared with toilet rolls.

7 The final Building

It should be noted that if you construct a building with A rated Eco products (roofing, walls, fenestration, flooring etc) this does not necessarily result in an energy efficient or quality building.

The components are part of the final buildings, the environmental effectiveness of the final building will depend on design, construction technique and how the occupants use the building.

We therefore feel that Eco label for construction should be reserved for the end building.

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EPW: European Plastic Window Association
FAECF: Federation of European Window and Curtain Wall Manufacturers' Association
FEMIB: Federation of the European Building Joinery Associations
UEMV: European Glaziers Association

EuroWindowdoor - The General Secretariat,
c/o UEAPME, 4, Rue Jaques De Lalaing, 1040 Bruxelles / Belgium
or
Walter-Kolb-Str. 1-7, 60594 Frankfurt am Main / Germany
Internet: www.EuroWindowdoor.org

This position was prepared and introduced by FAECF