

Ecolabelling

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Nordic Ecolabelling has prepared a proposal for revised criteria for ecolabelling of **houses**, which we give you the opportunity to comment before they are established by the Nordic Ecolabelling board. If you have any comments, we would like to receive these in writing **no later than 15. September 2009**.

Proposal for the criteria: Nordic Ecolabelling of **Houses**

Comments and standpoint

- | | | | |
|-------------------------------------|--|--------------------------|--|
| <input checked="" type="checkbox"/> | Supports the proposal entirely | <input type="checkbox"/> | Refrain from giving comments and standpoints. |
| <input type="checkbox"/> | Supports the proposal but with the following objections: | <input type="checkbox"/> | Refrain from giving comments and standpoints, but propose following changes. |
| | | <input type="checkbox"/> | Rejects the proposal on the following basis: |

Comments:

We support the proposal, but suggest that in the next revisions of the criteria, even more attention should be paid to primary energy consumption, the role of hot water and the provision of instructions to residents and other users of the buildings, as detailed below.

The criteria stress energy efficiency and the type of materials used. As concerns energy efficiency, requirements are placed on airtightness and total energy consumption. Of these, we consider total energy consumption to be the more important criterion. It is also commendable that the criteria for energy consumption are in line with the calculation rules of the energy certificate for buildings. It is to be expected that the energy certificate criteria in Finland are to be revised in 2012 so as to take into account primary energy consumption, which will make the criteria more relevant than at present.

Ground source heat pumps are a good solution to decrease primary energy consumption and carbon dioxide emissions, in particular in buildings that are located outside the district heating network. We suggest that Nordic Ecolabelling develop labelling criteria for ground source heating systems to complement the labelling criteria for housing.

The relative significance of water heating grows when the airtightness and energy efficiency of the building structures increases. The water heating system becomes an important environmental criterion, in particular in buildings that are located outside the district heating networks. The proposed labelling criteria for houses deal with water heating in two ways: (1) water conserving fittings are a requirement and (2) points are awarded for solar water heaters. In the future – as airtightness, etc. improve – increasing attention should be paid to water heating utilising renewable energy in cases where the buildings are located outside the district heating system. Solar water heaters are already legally mandated in a number of European countries and cities.

The building users have a significant impact on the energy consumption of the building. In the future criteria revisions, increasing attention should be paid to providing all users with instructions on how to use the building energy efficiently. The current labelling criteria proposal focuses on maintenance manuals; however, these are not necessarily communicated to residents in multi-apartment buildings or to day-care centre staff. The information for users should clearly communicate that Swan-labelled buildings do not conserve the environment unless they are used in an environmentally sound way.

further comment/documentation are enclosed

Reply from:

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