

EU Ecolabel for hard covering products

# User Manual

European Commission Commission Decision (EU) 2021/476 Version 1.0. April 2021

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# Using this manual

This manual guides you through the process of applying for an EU Ecolabel licence, in accordance with the applicable criteria requirements. The following symbols are used throughout:

Symbol	Description
<b>(i)</b>	If necessary for the interpretation of the criterion, subtitles with explanations, examples of calculations, decisions from the Competent Body Forum, etc.
	Boxes with definitions or additional explanations of technical terms that could complement the definitions already included in the article 2 of the Commission <u>Decision (EU) 2021/476</u> .
$\land$	Notable or important information.
	Documentation on how to fill in the verification form and information about documents to be handed in with the application.
6	Website links where further information can be found.

Thia document comprises the following parts of the user manual:

- Part A: General Information Provides information about the EU Ecolabel (including a summary of the criteria), details of the application process, and answers to frequently asked questions about applying.
- **Part B: Product Assessment and Verification** Outlines the criteria for a specific product group set out in the relevant Commission Decision. An example from this section is shown below:

The user manual also consists of the following elements as separate files:

- Part C and D: Application and Verification Form This form should be completed by the applicant. The application and verification form is provided separately as an excel file. It includes a list of products covered by the application and indicates all the information necessary for the product certification, highlighting any tests and documentation that are required to demonstrate compliance. As the requirements vary depending on the type of product to be certified, one of four excel files should be used (there is one for natural stone, one for agglomerated stone, one for ceramic and one for precast concrete & compressed earth). Each excel file contains required input fields (green cells), optional input fields (yellow cells) and automatic output fields (red cells). Qualitative (e.g. pass/fail) and quantitative (e.g. 9.62 points) outputs are automatically generated. The total score is automatically generated and can be compared with the required pass mark in the "Summary" worksheet. The applicant also declares the veracity of the information on the excel file before submitting it to the competent body (by signing at the bottom of the "Application" worksheet). This facilitates the application process as it allows the application and verification form to be provided in an electronic form to the competent body.
- Annex I. Declarations from an external suppliers These declarations are to be completed as part of the application and verification process whenever provision of the external or third party information/verification is requested or necessary i.e. in case of an external supplier. The relevant declarations are included in Annex I that is provided as separated file that forms part of the User Manual.



• Part E: Checklist

The applicant shall gather all the necessary declarations from their supplier(s) and provide them to the assessing Competent Body together with the application and verification form. These declarations can also be provided directly from the supplier to the Competent Body. An example of the declaration is given below:

The Declaration Forms from external supplier shall serve as proof of compliance whenever the assessment and verification of the criterion accepts or requires the declaration from an external supplier or third party verification.

Please read this manual all the way through before completing and submitting the application form or any other documentation. EU Ecolabel <u>Competent Bodies</u> can help licence holders understand the EU Ecolabel criteria and can provide guidance on how to assemble an application dossier.



## Introduction

This User Manual<sup>1</sup> is designed to help you apply for the EU Ecolabel. It includes an outline of all data, tests and documentation that are required to demonstrate compliance with the criteria.

The basis for the manual is a <u>Commission Decision (EU) 2021/476</u> establishing the ecological criteria for the award of the EU Ecolabel hard covering products. A copy of the criteria can be found at:

http://ec.europa.eu/environment/ecolabel/products-groups-and-criteria.html

This document is not aimed to duplicate the content of the criteria but is intended to support their interpretation, and is mainly focused on helpful explanations and clarifications. Each criterion name appears as a heading under Part B with a short summary of what documents are needed for the verification of the criterion. The exact criterion text does not appear in this user manual. Only additional information, clarifications and explanations are included.

Please read the criteria document (<u>Commission Decision (EU) 2021/476</u>) all the way through before completing and submitting the verification form or any other documentation

For general questions about the EU Ecolabel and the application process please check out following pages:

http://ec.europa.eu/environment/ecolabel/faq.html http://ec.europa.eu/environment/ecolabel/how-to-apply-for-eu-ecolabel.html

# Part A: General Information

Part A "General information" is a standard document for all EU Ecolabel products explaining the different steps of the application process in detail. It has been translated in each Member State language and can be found at:

https://ec.europa.eu/environment/ecolabel/documents.html

<sup>&</sup>lt;sup>1</sup> This User Manual is for guidance only; it does not have any legal standing and does not, in any way, replace the Commission Decision or any relevant legislation. In case of doubt on specific points in the Manual, please refer directly to the national Competent Body.



# Part B: Product Assessment and Verification

## 1 Scope

The scope of the criteria is focussed on **final products**, specifying the product formats (e.g. floor tile, wall tile etc.) in Article 1(1) of the Commission Decision and materials (i.e. natural stone, agglomerated stone, ceramic, precast concrete and compressed earth) in Article 1(3).

Certain intermediate products are also included in the scope (i.e. can be awarded the EU Ecolabel license under <u>Commission Decision 2021/476</u>) by referring to recital 8 therein. For clarity, these **intermediate products** are:

- **Quarry stone blocks (also referred to as dimension stone)**: these are large blocks or slabs that are cut directly from quarries and that can reach sizes of up to 2x2x3 metres. They are then transformed to final products by the same quarry operator or, in the majority of cases, sold to transformation plants operated by other companies.
- Hydraulic binders: this generally refers to all the different classes of common cement defined in EN 197-1 and to hydraulic lime defined in EN 459-1. The companies that produce hydraulic binders are almost always independent of the precast concrete or compressed earth block manufacturers.

**Alternative cements:** this refers to cements that do not meet the compositional requirements of EN 197-1. This could refer to novel blended Portland cements, alkali-activated cements and geopolymers that could potentially be used in precast concrete production. These products represent a much smaller market share than the EN 197 cements but offer major opportunities for innovative and low environmental impact cements.

Check whether your candidate products are in the scope (read recital 8 and Article 1 of the <u>Commission</u> <u>Decision (EU) 2021/476</u> and check against the drop-down menu in cell E13 of the 'Application'

worksheet in the Parts C & D excel file). There is a lot of information in the user manual, much of which is specific only to certain types of products. Consequently, before starting the process, it is worth considering what criteria actually apply and what type of

information might be necessary from suppliers and other third parties.

Product type	Applicable criteria	External information needed
Natural stone (intermediate block/slab from quarry)	1.1, 1.2, 1.6, 1.7 and 2.1, to 2.6	Information from fuel and electricity supplier about renewable content (for criterion 2.1)
Natural stone (final product(s) from transformation plant.	1.1 to 1.7 and 2.1 to 2.11	Information from quarry operator(s) from where blocks are obtained to make the products covered by the application (for criteria 1.1 and 2.1 to 2.6) Information from suppliers of chemicals used (for criterion 1.2) (Potentially) information about testing of VOC emissions (criterion 1.3) Information from fuel and electricity supplier about renewable content (for criterion 2.1)



Product type	Applicable criteria	External information needed
		Information from virgin raw material supplier(s) about quarry (for criterion 1.1)
	4 4 to 4 7 and	Information from suppliers of chemicals used (for criterion 1.2)
Aggiomerated stone based on resin binder*	1.1 to 1.7 and 3.1 to 3.5	Information about testing of VOC emissions (criterion 1.3)
		Information from fuel and electricity supplier about renewable content (for criterion 3.1)
		Information from virgin raw material supplier(s) about quarry (for criterion 1.1)
		Information from suppliers of chemicals used (for criterion 1.2)
		(Potentially) information about testing of VOC emissions (criterion 1.3)
Ceramic or fired clay product	1.1 to 1.7 and 4.1 to 4.7	(Potentially) information from spray-dried powder supplier (criterion 4.1)
		(Potentially) information from spray-dried powder supplier (criterion 4.2)
		(Potentially) information from operator of wastewater treatment plant (criterion 4.5)
EN 197 1 comont -	1.1, 1.2, 1.6,	Information from virgin raw material supplier(s) about quarry (for criterion 1.1)
intermediate product	1.7 and 5.1 to	Information from suppliers of chemicals used (for criterion 1.2)
	5.5	
Hydraulic lime –	1.1, 1.2, 1.6,	Information from virgin raw material supplier(s) about quarry (for criterion 1.1)
intermediate product	5.3	Information from suppliers of chemicals used (for criterion 1.2)
Alternative cement with >30% clinker content – intermediate product	1.1, 1.2, 1.6, 1.7 and 5.1 to 5.3	Information from virgin raw material supplier(s) about quarry (for criterion 1.1) Information from suppliers of chemicals used (for criterion 1.2)
Alternative cement	1.1, 1.2, 1.6,	Information from virgin raw material supplier(s) about quarry (for criterion 1.1)
content – intermediate	1.7, 5.1 and 5.2	Information from suppliers of chemicals used (for criterion 1.2)
		Information from virgin raw material supplier(s) about quarry (for criterion 1.1)
Precast concrete or		Information from suppliers of chemicals used (for criterion 1.2)
compressed earth	1.1 to 1.7 and	(Potentially) information about testing of VOC emissions (criterion 1.3)
cement	5.1 to 5.6	(1) of the matrix $(1)$ and $(1)$
		from cement clinker production (criteria 5.1 to 5.3)
		Information from raw material supplier(s) about quarry (for criterion 1.1)
Precast concrete or	11+017	Information from suppliers of chemicals used (for criterion 1.2)
compressed earth	5.2 to 5.6	(Potentially) information about testing of VOC emissions (criterion 1.3)
based on nydraulic lime		Information about CO2 emissions and other emissions to air from lime production (criteria 5.2 and 5.3)
Precast concrete or	1.1 to 1.7 and	Information from raw material supplier(s) about quarry (for criterion 1.1)
compressed earth based on alternative	5.1 to 5.6	Information from suppliers of chemicals used (for criterion 1.2)



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Product type	Applicable criteria	External information needed
cement with >30%		(Potentially) information about testing of VOC emissions (criterion 1.3)
clinker content		Information about clinker factor, CO2 emissions and emissions to air from cement clinker production (criteria 5.1 to 5.3)
Precast concrete or		Information from raw material supplier(s) about quarry (for criterion 1.1)
compressed earth	1.1 to 1.7,	Information from suppliers of chemicals used (for criterion 1.2)
cement with <30%	5.5 and 5.6.	(Potentially) information about testing of VOC emissions (criterion 1.3)
clinker content		Information about clinker factor and CO2 emissions (criteria 5.1 and 5.2)

\*It should be noted that the general title 'agglomerated stone' was changed to 'agglomerated stone based on resin binder' in order to make it clear that these criteria (i.e. 3.1 to 3.5) do not apply to agglomerated stone products that use a **cement binder**. In cases of the latter type of product, although apparently rare in the EU market, the product should be treated as a precast concrete product as far as determining what criteria it needs to comply with (i.e. 5.1 to 5.6).

To ensure that uptake statistics can be correctly compiled, a license should only apply to one of the types of products listed in the left hand column of the table above (this is the drop down list appearing in cell E13 of the "Application" worksheet of the excel file for Parts C and D). So it is not possible to combine e.g. agglomerated stone data with natural stone data, even if they are made by the same company.

For simplicity of data compilation and record-keeping, the excel file should apply to a single site only (potentially with a breakdown of more specific data for different products from the same site). Whether one excel should be submitted per license or if multiple excels can be submitted per license should be decided by discussions between the applicant and the relevant Competent Body.

#### 1.1 Quick check of the criteria

If you are confident about being able to obtain the relevant information rom suppliers and other external parties, it is then recommended that you start checking internally if the candidate product(s) are likely to fulfill the criteriat:

- Make sure the candidate product fulfils all applicable legal requirements of the country or countries in which the product is intended to be placed on the market.
- Check what type of evidence is required for each of the relevant criteria. To do this, download the Parts C & D excel file, which is available at: <u>https://ec.europa.eu/environment/ecolabel/products-groups-and-criteria.html under "Hard covering products"</u>.
- Make sure that any intermediate products or virgin raw materials can meet the relevant mandatory requirements.



## 1.2 Parts C & D excel file: "Application" worksheet

# In the excel file, you have to fill in the green cells. Yellow cells are optional, red cells provide automatic outputs and grey cells are not active.

The first worksheet users are presented with upon opening the excel file is titled 'Application'. This is the basic information needed to run the administrative part of the application process.

The mandatory information in cell E13 and the optional entry in cell E14 is important for understanding where exactly the EU Ecolabel for this product group is having most interest – which will be important to know when the time comes to revise the criteria in the future.

By providing information about the type of company (size and location) in the same worksheet (cells E18, E19, E20 and E21), the potential applicant can know if any discounts will apply to potential application fees, site inspection fees and annual fees.

The Competent Body may request relevant evidence about the size, turnover and location of your company and, if applicable, EMAS registration or ISO 14001 certificates.

## 1.3 Parts C & D excel file, "Summary" worksheet

From the beginning of the process, the applicant should have a list of products in mind that the application should refer to. A full list of these products should be filled out in Column B of the "Summary" worksheet.

The names used for the product should be defined by the applicant and do not necessarily need to correspond to any commercial names for the products. However, if commercial names are used and there is an associated EAN number, this latter information should also be included in Column C. of the 'Summary' worksheet. It is understandable that this list may be dynamic and may need to be updated periodically as product catalogues change.

In cases where lots of different individual EU Ecolabel products are produced in the same factory, and their differences are insignificant in terms of the data for the EU Ecolabel application, they can be grouped together into the same row. In these cases, the number of products grouped should be stated in Column D. If no number is inserted here, it will be assumed to be 1.

Competent Bodies are required to report statistics on the number of products covered by EU Ecolabel licenses twice per year. So applicants should be prepared to update this list twice per year if requested. Please note that licence holders are also responsible for registering their products and services on the online EU Ecolabel product and service catalogue (ECAT) to ensure licence traceability<sup>2</sup>.

A screenshot of the "Summary" worksheet for the ceramic tile excel is shown below:

<sup>&</sup>lt;sup>2</sup> https://ec.europa.eu/environment/ecolabel/how-to-apply-for-eu-ecolabel.html



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	A B	с	D	E	F	G	н I	J	K	L   1	M N	0	P Q	R	S	Т	U	V	W	Х	Y	Z	AA	AB
1	EU Ecolabel ha	ard covering pro	ducts																					
2	Approximate number of products covered by application:																							
3	Approximate volume of products covered by application:			t/year																				
4	Approximate value of products covered by application:			EUR/y	ear																			
5	Type of product subject to the application?	Ceramic tile																						
	Please provide a list of the individual product names/tra	demarks/codes covered	by the application	n (Colu	mn B). T	The first	t 5 rows	or relev	ant poi	ints is a	utomatica	ally lini	ed to the	other w	orkshe	ets. If	fmult	iple d	ata se	ts are	includ	ed (i.e.	more sp	ecific than
7			fi	actory	level dat	ta), the	ese shoule	l be add	ed as a	ppropr	riate.													
			No. of products																					
						0	liandale esta	ania and	nointe															
8	Individual product name/production run reference /	EAN (if relevant)	covered by			Appl	licable crit	eria and	points,	where	relevant. C	elis in p	reen shoul	d be till	ed out t	based (	on dat	a prov	ided i	n the c	ther w	orkshee	(ts)	
8 9	individual product name/production run reference / production line reference / factory name	EAN (if relevant)	covered by entry	1.1	1.2	Appl	1.4 1.9	eria and	points, 1.7	where i	4.1	elis in j	4.2	d be fill 4.3	ed out t	based (	on dat 4.4	a prov	ided i	4.5	ther w	orkshee 4.7	ts) Total	Pass mark
8	Individual product name/production run reference / production line reference / factory name	EAN (if relevant)	covered by entry	1.1 Raw	1.2 Haz.	Appl	1.4 1.9 Use	eria and 1.6	1.7	where i 4 fuel Fu	4.1 Fuel Fuel	co2	4.2 CO2 CO2	4.3	Spray	Kiln	on dat 4.4	Kiln	Kiln	4.5 Waste	4.6 Process	4.7 Glazes	Total	Pass mark
8 9	Individual product name/production run reference / production line reference / factory name	EAN (if relevant)	covered by entry	1.1 Raw Mat.	1.2 Haz. Sub.	Appl 1.3 VOC Fit	1.4 1.5 itness Use	eria and 1.6 Info on Iabel	1.7 EMS s	Fuel Fuel SCP	4.1 vel Fuel ore Score ND Overall	CO2 SCORE	4.2 CO2 CO2 score scor KWD Overs	4.3 Water cons.	Spray dryer dust	Kiln dust	on dat 4.4 Kiln HF	Kiln NOx	Kiln SOx	4.5 Waste water	4.6 Process waste	4.7 Glazes and inks	Total	Pass mark
8 9 10 11	Individual product name/production run reference / production line reference / factory name	EAN (if relevant)	covered by entry	1.1 Raw Mat. Pass	Haz. Sub.	Appli 1.3 : VOC Fin Pass F	IICable crit 1.4 1.9 Itness Use Info Pass Pas	eria and 1.6 Info on label Pass	<b>1.7</b> EMS 5	Fuel Fuel Fuel Fuel SCIP KV 6.80 13	4.1 Jel Fuel ore score ND Overall 56 14.69	CO2 score SDP 20.83	4.2 CO2 CO2 score scor KWD Overs 25.00 23.5	4.3 Water cons. Pass	Spray dryer dust Pass	Kiln dust	4.4 Kiln HF 5.00	Kiln NOx 10.00	Kiln SOx	4.5 Waste water Pass	4.6 Process waste 6.80	4.7 Glazes and inks Pass	Total 76.53	Pass mark
8 9 10 11 12	Individual product name/production run reterence / production line reference / factory name	EAN (if relevant)	covered by entry	1.1 Raw Mat. Pass	Haz. Sub. Pass	Appl 1.3 VOC Fit Pass F	licable crit       1.4     1.5       itness     Use info       Pass     Pass	eria and 1.6 Info on label s Pass	points,           1.7           EMS           0.00	Fuel Fuel Fuel Fuel SCIP KV 6.80 13	4.1 vel Fuel ore score ND Overall 56 14.69 LSE FALSE	CO2 SCORE SDP 20.83	4.2 CO2 CO2 score scor KWD Over 25.00 23.5 FALSE FALS	4.3 Water cons. Pass	Spray dryer dust Pass	Kiln dust 7	4.4 Kiln HF 5.00	Kiln NOx 10.00	Kiln SOx	4.5 Waste water Pass	4.6 Process waste 6.80	4.7 Glazes and inks Pass	Total 76.53 IIVALUE!	Pass mark
8 9 10 11 12 13	Individual product name production run reference / production line reference / factory name	EAN (if relevant)	covered by entry	1.1 Raw Mat. Pass	1.2 Haz. Sub. Pass	Appl	licable crit 1.4 1.1 itness Use info Pass Pass	eria and 1.6 Info on Iabel S Pass	1.7 EMS 5	Fuel Fuel Fuel Fuel Fuel SDP KV 6.80 13 FA	4.1 Jel Fuel ore score ND Overall 56 14.69 LSE FALSE FALSE FALSE	CO2 SCOR SDP 20.83	4.2           CO2         CO2           score         score           KWD         Overa           25.00         23.5           FALSE         FALSE           FALSE         FALSE	4.3 Water Cons.	Spray dryer dust Pass	Kiln dust 7	4.4 Kiln HF 5.00	Kiln NOx 10.00	Kiln SOx 10.00	4.5 Waste water Pass	4.6 Process waste 6.80	4.7 Glazes and inks Pass	Total 76.53 WALUEI WALUEI	Pass mark 50 50 50 50 50 50 50 50 50 50 50 50 50
8 9 10 11 12 13 14 15	Individual product name production run reference / production line reference / factory name	EAN (if relevant)	covered by entry	1.1 Raw Mat. Pass	1.2 Haz. Sub. Pass	Appli	1.4     1.4       1.4     1.5       itness     Use info       Pass     Pass	eria and 1.6 Info on label s Pass	1.7 EMS 5 0.00 1	Fuel Fuel Fuel SOP KV 6.80 13 FA FA	Fuel         Fuel           yel         Fuel           ore         score           VD         Overall           .56         14.69           JASE         FALSE           JASE         FALSE           LSE         FALSE           LSE         FALSE           LSE         FALSE	CO2 score SDP 20.83	4.2 CO2 CO2 score score KWD Overs 25:00 23:55 FALSE FALSE FALSE FALSE FALSE FALSE	4.3 Water cons. Pass E E E	Spray dryer dust Pass	Kiln dust 7	4.4 Kiln HF 5.00	Kiln NOx 10.00	Kiln SOx	4.5 Waste water Pass	4.6 Process waste 6.80	4.7 Glazes and inks Pass	Total 76.53 IVALUEI IVALUEI IVALUEI IVALUEI	Pass mark 50 50 50 50 50
8 9 10 11 12 13 14 15 16	Individual product name production run reference / production line reference / factory name	EAN (if relevant)	covered by entry	1.1 Raw Mat. Pass	1.2 Haz. Sub. Pass	Appli	1.4     1.4       1.4     1.5       itness     Use info       Pass     Pass	eria and 1.6 Info on label Pass	L.7 EMS S	Fuel Fuel Fuel Fuel SCIP KV 6.80 13 FA FA	Fuel         Fuel           yel         Fuel           ore         score           ND         Overall           .56         14.69           LSE         FALSE           LSE         FALSE           LSE         FALSE           LSE         FALSE           LSE         FALSE	CO2 SCOTE SCOP 20.83	A.2           CO2         CO2           score         score           KWD         Overa           25.00         23.5           FALSE         FALSE           FALSE         FALSE           FALSE         FALSE           FALSE         FALSE	4.3 Water Water cons. H Pass E E E	Spray dryer dust Pass	Kiln dust 7	4.4 Kiln HF	Kiln NOx 10.00	Kiln SOx 10.00	4.5 Waste water Pass	4.6 Process waste 6.80	4.7 Glazes and inks Pass	Total 76.53 WALUE! WALUE! WALUE!	Pass mark 50 50 50 50 50 50

The information in cells C2 and C5 is automatically carried forward from the "Application" worksheet. The optional information in cells C3 and C4, when collected from multiple licenses, is extremely useful for the Commission when trying to measure the impact of the EU Ecolabel criteria – so users are encouraged to provide information here whenever possible, even if it is only a very approximate estimate.

The "Summary worksheet is organised in rows, with one row per product/product group, potentially allowing for a unique score to be generated for each product/product group. In reality, the same data will in many cases apply for multiple or even all products/product groups in the list. Where the input is guaranteed to be the same always, because the criterion always applies at the level of the whole site, the cells from row 12 and below are blacked out.

The first 5 rows are automatically linked to 5 fully independent data entries in another worksheet (in this case for criteria 4.1 to 4.7). Users should use these automatic links and, depending on feedback from the webinar – this could be increased up to 10 or even 20 automatic entries. Going beyond 20 automatically linked entries, it would make more sense to submit an additional excel sheet or to manually enter the additional entries into the "Summary" worksheet..

The best way to arrange the data and to group products will depend directly on how the production process is organised and how data is collected. For example, if a production process is continuous all year round, one data set would be suitable. However, for batch processes, data could be submitted at the level of each batch or, being more practical, the batch data could be agglomerated if it is very similar between batches.

Another example is if multiple production lines run in parallel but connect to the same, centralised exhaust gas abatement system. If individual scores are needed for each production line, then either the unclean gas pollutant levels and flow rates need to be measured from each production line and a justifiable % removal efficiency of the centralised system be applied, or the clean gas emissions can be allocated and weighted according to each of the contributing production lines.

These considerations about how to deal with data should be agreed with the Competent Body at the earliest stages of the application process.



## 2 Product Group Criteria Overview

1.

The following table summarises all criteria of the <u>Commission Decision (EU) 2021/476</u> of 16 March 2021 establishing the EU Ecolabel criteria for hard covering products (intermediate product criteria in blue).

1.1. Industrial and construction mineral extraction 1.2. Restricted substances

Criteria common to all hard covering products

1.3. VOC emissions										
1.4. Fitness for use										
1.5. User information										
1.6. Information appearing on the EU Ecolabel										
1.7. Environmental Management System (optional)										
Material and technology specific criteria										
2. Natural stone	5. Precast concrete or compressed earth blocks with hydraulic binders or alternative cements									
2.1. Energy consumption at the quarry*	3.1. Energy consumption	4.1. Fuel consumption for drying and firing	5.1. Clinker factor**							
2.2. Material efficiency at the quarry*	3.2. Dust control and air quality	4.2. CO2 emissions	5.2. CO2 emissions**							
2.3. Water/wastewater management at quarry*	3.3. Recycled / secondary material content	4.3. Process water consumption	5.3. Emissions of dust, NOx and SOx to air**							
2.4. Dust control at the quarry*	3.4. Resin binder content	4.4. Emissions of dust, HF, NOx and SOx to air	5.4. Recovery and responsible sourcing of raw materials							
2.5. Personnel safety and working conditions at the quarry*	3.5. Reuse of process waste	4.5. Wastewater management	5.5. Energy consumption							
2.6. Quarry landscape impact ratios* (optional)		4.6. Reuse of process waste	5.6. Environmentally innovative product designs (optional)							
2.7. Energy consumption at the trans. plant		4.7. Glazes and inks								
2.8. Water/wastewater management at the transformation plant										
2.9. Dust control at the transformation plant										
2.10. Reuse of process waste from the transformation plant										
2.11. Regionally integrated production at the transformation plant (optional)										

\*criteria applicable for awarding the EU Ecolabel to intermediate blocks of dimension stone from natural stone quarries. \*\*criteria applicable for awarding the EU Ecolabel to intermediate hydraulic binders or alternative cement products.



As mentioned earlier, for any given product group, only some of the criteria will apply. So make sure that you read in detail the criteria related to your own product group of interest and do not lose time reading about non-relevant criteria.

## General conditions regarding assessment and verification

On page 8 of Commission Decision (EU) 2021/476, some general conditions about assessment and verification are mentioned. This text is there to state clearly some additional conditions that can generally apply which might not always be explicit in the actual assessment and verification text of individual criteria.

To avoid repreating these conditions with the assessment and verification text for each criterion, they are generally stated before the first criterion appears in Commission Decision (EU) 2021/476. For ease of reference, these conditions are repeated below.

"Where the applicant is required to provide declarations, documentation, analyses, test reports or other evidence to show compliance with the criteria, these may originate from the applicant and/or his supplier(s) and/or their supplier(s), etc. as appropriate.

Competent bodies shall preferentially recognise attestations that are issued by bodies accredited in accordance with the relevant harmonised standard for testing and calibration laboratories, and verifications by bodies that are accredited in accordance with the relevant harmonised standard for bodies certifying products, processes and services.

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

Where appropriate, competent bodies may require supporting documentation and may carry out independent verifications or site inspections to check compliance with these criteria.

Changes in suppliers and production sites pertaining to products to which the EU Ecolabel has been granted shall be notified to Competent Bodies, together with supporting information to enable verification of continued compliance with the criteria.

As a prerequisite the hard covering product(s) shall meet all applicable legal requirements of the country or countries in which the product is placed on the market. The applicant shall declare the product's compliance with this requirement."

In plain English, these conditions basically mean that:

While the applicant should provide all the relevant information to the competent body, it is also possible for suppliers or other upstream actors to provide information directly to the competent body, thus by-passing the applicant. This could be relevant if, for example, certain information is considered as commercially sensitive.



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The competent body has the right to accept results from test methods that they consider suitably equivalent to those stated in Commission Decision (EU) 2021/476.



to ensure that the criteria are being complied with.

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m 
m M$  If the application is successful, there is an obligation for the license holder to check for continued compliance and notify the competent body of any non-compliance issues.



# Horizontal criteria (common to all hard covering products)

## Criterion 1.1 Industrial and construction mineral extraction

## () Interpretation of criterion:

The criterion requires a number of pieces of information relating to the raw materials extracted. Such materials may be extracted by the same applicant company or by another company. Depending on the product(s) in question, there may be more than one raw material for which information is required.

As a minimum, information should be provided for the following raw materials, as a function of the product type in question:

- For intermediate or final natural stone products: information relating to dimension stone extraction activities at the natural stone quarry or quarries.

- **For agglomerated stone products**: information relating to extraction activities for virgin limestone/marble or quartz material. It should be noted that if the limestone or quartz are by-products of dimension stone extraction from natural stone quarries, information about the quarry shall still be required.

- For ceramic products: information relating to the extraction of clay or other non-metallic minerals, such as feldspars. In cases where multiple minerals are used, information should cover the extraction activities relating to at least 90% by weight of the raw materials used in the product(s).

- For intermediate hydraulic binder products: information relating to the extraction of limestone and clay. In cases where multiple minerals are used, information should cover the extraction activities relating to at least 90% by weight of the raw materials used in the product(s). This requirement applies equally whether the raw materials enter the kiln or are used as supplementary virgin materials that may be blended with the cement clinker or lime afterwards.

- For intermediate alternative cement products: information relating to the extraction of limestone, clay or any other virgin raw materials that may be used. In cases where multiple minerals are used, information should cover the extraction activities relating to at least 90% by weight of the raw materials used in the product(s).

- **For precast concrete products**: information relating to the extraction of coarse virgin aggregates, fine virgin aggregates and any virgin mineral fillers used. In cases where multiple minerals are used, information should cover the extraction activities relating to at least 90% by weight of the raw materials used in the product(s).

- For compressed earth blocks: information relating to the extraction of any virgin clay or other nonmetallic minerals. In cases where multiple minerals are used, information should cover the extraction activities relating to at least 90% by weight of the raw materials used in the product(s).

Because the criteria are pass/fail and the precise contents of virgin raw materials used could vary significantly between products covered by the same EU Ecolabel application, it would be <u>simplest to combine all relevant</u> <u>information about virgin raw materials in a single entry to the Parts C & D excel file</u> that accounts for all products covered by the application.



#### Required documentation for Assessment and verification:

The applicant shall provide documentation to the Competent Body containing information that demonstrates compliance with the requirement.

- Fill out the Declaration in Parts C & D excel file worksheet for criterion 1.1, specifying the relevant raw material(s) and quarry or quarries. It should be explained here whether or not the quarries are owned or operated by the applicant or by another organisation.
- Provide a map or maps of where the relevant virgin raw material quarry or quarries are located and documentation from a relevant regional or national authority that the extraction activity is authorised.
- A copy of an environmental impact screening study for the extraction activities at each relevant virgin material quarry and, if deemed relevant by the screening exercise, a full environmental impact assessment report.
- A copy of the rehabilitation management plan for the relevant virgin material quarry or quarries.
- A declaration of the quarry owner/operator of compliance with the requirements of Regulation (EU) No 1143/2014 on the prevention and management of the introduction and spread of invasive alien species.
- A declaration of the quarry owner/operator of compliance with the requirements of Directive 92/43/EEC (Habitats Directive) and Directive 2009/147/EC (Birds Directive).

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In cases of raw materials that are extracted from sites located outside the EU, direct compliance with the Habitats Directive, the Birds Directive or the Invasive Species Regulation is not possible since a different legal framework will apply. In these cases, and specifically when the extraction sites lie within protected areas, the burden of providing equivalent evidence that is deemed satisfactory by the Competent Body lies with the quarry owner/operator.

With regards to environmental impact assessments and rehabilitation management plans, the same principles defined in EU methodology can quite easily be applied to non-EU quarries, even if not exactly in compliance with the EU legislation.

For clarity, rehabilitation management plans shall be requested for relevant quarries regardless of whether or not they are linked to the authorisation of the extraction activity.

Also for clarity, to avoid disproportionate assessment and verification efforts, the 90% raw material threshold stated in this User Manuals should not be considered as absolutely rigid. For example, if there are 6 virgin raw materials used, and 4 of them account for 88% of the total, it could be deemed optional to provide evidence for either of the remaining 2 materials.

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## How the interface looks in the Parts C & D excel worksheet

Non-virgin raw materials are counted as automatically meeting the requirements if the applicant selects "*n/a not virgin material*" in columns F to J. This is the % of raw materials that meet each of the 5 main requirements of criterion 1.1. All of these values should ideally be 100. If <90, text is flagged in red

	corumn	SFLUJ.							
	В	c	D	E	F	G	н	1	J
1		EU I	Ecolabe	el hard cove	ring products				
2	Type of product subject to the application:	Precast concrete or compressed earth block							
3	Level of data reported for criterion 1.1:	At the production run level (1 data set per >1 licens	ed product				1		
4	Criterion 1.1 - Industrial & construction m	ineral extraction							
5	Share of raw materials covered by each sub-reg	uirement (should be >90%):			100	85	100	100	100
6	Please indicate the relevant raw materials used, stating clearly whether it is virgin or secondary/recycled material	Please indicate the approximate % share (by weight) of the total ingoing materials that this material accounts for	Is it a virgin raw material?	is quarry owned or operated by the applicant?	Quarry location and authorisation provided to C8? (and by whom)	Copy of EIA screening and/or EIA report provided?	Copy of rehabilitation management plan provided?	Declaration from quarry owner/operator on invasive species provided?	Declaration from quarry owner/operator on the habitats and birds Directives provided?
7	Coarse aggregate-recycled concrete aggregate (8-16mm)	22.0	No	n/a, not virgin material	n/a, not virgin material	n/a, not virgin material	n/a, not virgin material	n/a, not virgin material	n/a, not virgin material
8	Coarse aggregate-gravel (8-16mm)	46.0	Yes	No	Yes, by applicant	Yes, by applicant	Yes, by applicant	Yes, by applicant	Yes, by applicant
9	Coarse aggregate-recycled concrete aggregate (4-8mm)	5.0	No	n/a, not virgin material	n/a, not virgin material	n/a, not virgin material	n/a, not virgin material	n/a, not virgin material	n/a, not virgin material
10	Fine aggregate-gravel (0.5-2.0mm)	12.0	Yes	No	Yes, by quarry operator	Yes, by quarry operator	Yes, by quarry operator	Yes, by quarry operator	Yes, by quarry operator
11	Filler-limestone	8.0	Yes	No	Yes, by applicant	No	Yes, by applicant	Yes, by applicant	Yes, by applicant
12	Sand	7.0	Yes	No	Yes, by quarry operator	No	Yes, by quarry operator	Yes, by quarry operator	Yes, by quarry operator
13									
14									
12									
17									
18									
19									
20									
21									

In the image above, a ficticious example of raw materials used by the applicants for a production run level in making precast concrete is provided. It can be seen that the total materials counted add up to 100% and include not only virgin raw materials, **but also recycled/secondary materials**.

The requirements of criterion 1.1 generally apply to the extraction of virgin raw materials. Recycled or secondary materials should be considered as automatically compliant because they do not create any direct impacts due to extraction activities. All the user has to do is state that it is not virgin material in Column D, and select "n/a, not virgin material" from the dropdown menus in Columns F to J.

In Column E, it is important to define if the quarry is owned or operated by the applicant. Some limited flexibility is allowed for non-compliance with the 5 main requirements of criterion 1.1 (i.e. up to 10% of raw materials may not have all the required evidence). The thinking behind this approach is precisely for cases where third party quarry operators do not provide all the required information in a reasonable timescale, thus delaying the application. However, this flexibility should not apply to any quarries owned or operated by the applicant.

The percentage totals of compliant raw materials for each of the 5 requirements are automatically summed in cells F5 to J5. If the values are less than 90, the text automatically turns red and bold font – highlighting that this is not appropriate for awarding the license. The example above shows that the EIA screening study (or full EIA report, if one was required) to be provided for either the filler limestone and/or the sand.

If the 90% value is met for the 5 requirements, a "Pass" output is automatically generated for criterion 1.1, which also carries forward to the "Summary" worksheet.



## Criterion 1.2. Restricted substances

#### (i) Interpretation of criterion:

In order to demonstrate the compliance with each of the sub-criteria under criterion 1.2 an applicant should first of all compile a list of all the relevant chemicals used, together with appropriate documentation (i.e. safety data sheet and/or a declaration from the chemical supplier).

Regarding the scope of chemicals to be addressed, it should be understood that the term "process chemicals" refers to chemicals that are used directly in the production process and that have the possibility of remaining in the final products. It should not be considered as referring to chemicals used for periodic cleaning and maintenance of equipment.

Ingoing raw materials used in the manufacturing of hard covering products is dominated by inorganic mineral materials which, with a few exceptions, do not generally have any hazardous classifications that are restricted by Article 6(6) of the EU Ecolabel regulation.

A number of chemicals may be used in the processing, such as waxes, resins, plasticisers, demoulding agents, accelerators, inks, glazes and pigments. The type of substance and its function will vary significantly depending on which of the four main sub-products is being manufactured (i.e. natural stone, agglomerated stone, ceramics or precast concrete).

Hard covering products are examples of simple articles, not having any component parts. For reference, Article 3(3) of REACH defines an article as "an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition".

#### Criterion 1.2(a)

The addition of chemicals during hard covering product manufacture typically represents only a very small fraction of the overall product weight. Consequently, in order to ensure an adequate screening for Substances of Very High Concern (SVHCs) at the 0.1% weight/weight threshold, the restriction on SVHCs (criterion 1.2 (a)) has been applied to the inqoing chemicals rather than the final product or component articles therein.

Consequently, the declarations for criterion 1.2(a) must originate from the chemical supplier (being collected by either the applicant or the Competent Body). Articles 7(2) and 33 of the REACH Regulation oblige suppliers to provide information about any SVHCs present in their products or articles at levels >0.1% weight/weight whenever requested to do so by their clients or customers. A window of up to 45 days for responses from suppliers is stated in the REACH Regulation.

For declarations from chemical suppliers, applicants should refer to example templates provided in <u>Annex I to</u> <u>the User Manual</u>.

#### Criterion 1.2(b)

Further restrictions on other hazardous substances and mixtures that are not SVHCs come into play in criterion 1.2(b) – the so-called CLP restrictions – because they restrict substances purely on the basis of their hazard classifications as defined in the CLP Regulation.

However, unlike the SVHC restrictions, the CLP restrictions <u>apply to the final product</u>, not to the ingoing substances (i.e. the threshold is 0.1% weight/weight in the final product).

The assessment process is therefore more complex, not requiring a simple "yes/no" from the supplier, but instead the safety data sheet (or a suitable declaration) with quantitative information about the classification of the chemical supplied and its individual ingredients.



The starting point is the typical information that would be required in sections 2 and 3 of the safety data sheet (either provided already in the safety data sheet or in a declaration). If there are any restricted hazards identified, this needs to be entered into the Parts C & D excel sheet. Further quantitative information is needed in order to arrive at the concentration of the restricted substance or mixture that would theoretically remain in the final product (i.e. the dosing rate and the retention factor). The worst case dosing rate should be used, so that only one entry is needed for each chemical. The retention factor is by default set to 100% and it is up to the applicant to justify any reasons why a factor of less than 100% should be used.

The above information will lead to a result that is either above or below 0.10% weight/weight. If the result is below 0.10%, then no further consideration is needed and the criterion has been met for that substance or mixture.

However, if the result is higher than 0.10%, then it further needs to be considered if the chemical has been chemically modified during the process such that the restricted hazard(s) no longer apply. It should be noted that <u>physical immobilisation is not to be considered here</u>, even if the hazard is related to a specific exposure pathway (e.g. inhalation).

If chemical modification cannot be justified, then the final option for complying is to check if there is a derogation in place for the restricted substance or mixture.

#### Required documentation for Assessment and verification

- Fill out the Declaration in the Parts C & D excel file worksheet for criterion 1.2. This includes the full list of chemicals and ingoing materials used by the applicant in the production process and filling out the other relevant columns in the excel sheet.
- Each chemical in the list must be supported by either a safety data sheet and/or a declaration from the chemical supplier. External supplier declarations are available in **Annex I to the User Manual**.
- If relevant, reasoning for deviation from a retention factor of 100% for the chemical or ingredient must be provided in writing to the Competent Body.
- If relevant, reasoning for the chemical or ingredient being considered to be exempted due to chemical modification must be provided in writing to the Competent Body.
- If relevant, evidence of compliance with any derogation conditions must be provided to the Competent Body upon request.

All ingoing chemicals and chemical formulations used in the production process by the applicant and any supplied materials that form part of the final product shall be covered by relevant declarations for compliance with criterion 1.2(a).

In the absence of a safety data sheet, the external supplier must declare the necessary information that would appear in sections 2 and 3 of a safety data sheet, in order to allow the applicant to evaluate compliance with criterion 1.2(b).



## How the interface looks in the Parts C & D excel worksheet

Since there are a number of cells that require entries for indicator 1.2, it is worth presenting how the cells appear in the Parts C & D excel worksheet.

A	В			C		U	E	r -	0	н	
1					EU Ec	olabel	hard cove	ring produ	cts		
2	Type of product subject to the	he application:	Precast concrete	or compressed earth	block						
23	Criterion 1.2 - Restricted	substances, All	chemicals us	ed in the prod	uction proce	s of prod	lucts covered by	the application	should be listed (e)	ample entry provid	ded
24	Level of data reported for cri	iterion 1.2:	Worst case data	only (1 data set for y	vorst licensed pro	luct)					
25	Name of supplied chemical and ingredient	ed chemical and specific classified ingredient Is a safety data sheet or declaration provided?		n provided? C/	S number	Dther registry number?	1.2 (a) Does the che contain any SVHC concentrations >0.10 Or is the ingredient a	mical 1.2 (b) If the che ingredients in the % w/w? those classific SVHC? Ecolabel, enter t	nical as a whole mixture, o chemical are classified wi ations restricted for the EU hem here (one row for each	er th	
26	Chemical A - mixture			Ves		n/a		No		H413	-
27	Chemical A - ingredient X			Yes		2345-67		No		H410	-
-	Chemical B - mixture			Yes		n/a		Yes			
28	Chemical B - mixture										_
28						Co	ontinues t	o Colum	ns I to O		_
28 29 20	8	G ts	н	I	,	Co ×	ntinues t	o Colum ≝	ns I to O ∾	0	
28 29 20 e of pro	8 oduct subject to the application:	و <b>ts</b>	н	1	,	Co	ntinues t	o Colum ≝	ns I to O	0	
e of pro	8 oduct subject to the application: 1.2 - Restricted substances. All	G ts an should be listed (e	H Example entry pr	ı ovided).	,	×	L L 1.2. Result Fail	o Colum ∞	ns I to O ∾	0	Tot
e of protection	8 oduct subject to the application: 1.2 - Restricted substances. All supplied chemical and specific classified ingredient	6 15 12 (b) If the chemical as ingredients in the chemical incredient of the classifications retrici- enter them here form	H example entry pr a whole mixture, or a lare classified with efforthe EU Ecolabel, erow for each)	1 ovided). 1.2 (b) Maximum concentration of the restricted ingredient (N)	J.2 (b) Maximum dos rate of the chemical the full combination kg/t	K 1.2 (b) Retention factor (%)	L L L2. Result Fail 12 (b) Maximum concentration of resident Substance or mixture in the product (N)	о Colum м Is the use of the channical permitted with fU Ecolabel products?	N 1.2 (b) (1%0.1%) is the hazardous substance chemically modified during processing with hat the restricted hazard no longer exists	0 1.1 (b) (If 0.1% and no chemical modification) is the presence of the haardous substance droughted and you whet the decigation conditions?	Tot
e of pro-	8 oduct subject to the application: 1.2 - Restricted substances. All supplied chemical and specific classified ingredient mixture	6 ts 12 (b) If the chemical as ingredients in the chemical those classifications retrieved enter them here (on H413	H a whole mixture, or a lare classified with the for the EU fociabel, e row for each)	vided). 12 (b) Maximum concentration of the restricted ingredient (N) 100	J 1.2 (b) Maximum dos rate of the chemical the full control in kg/t 3	K k k k k k k k k k k k k k k k k k k k	L 1.2. Result Fail 12 (b) Maximum concentration of restricted substance or missione of the product (b) 0.3	M Is the use of the chemical permitted with EU Ecolabel products? Consider further	N 12 (b) (f A1N) is the heardour substance chemically modified during processing such that the restricted heard on gree exists No	0 12 (b) (if >0.1% and no chemical modification) is the presence of the haradous substance derogated and you met the derogation conditions? Ves	Tot
e of pro-	8 oduct subject to the application: 1.2 - Restricted substances. All supplied chemical and specific classified ingredient mixture ingredient X	6 <b>13</b> (b) if the chemical as ingredients in the chemical those classifications retri- those classifications retri- menter them here (on H4113 H410	H a whole mixture, or a ner classifier or the for the EU Scolabel, a row for each)	1 ovided). 1.2 (b) Maximum concentration of the restricted ingredient [N] 100 2.5	J 2 (b) Maximum dor rate of the chemical the full combination kg/t 3 30	K 12 (b) .e. Retention factor (%) 100	L 1.2. Result Fail 12(b) Natismum concentrations of restricted substance or mixture in the product (%) 0.075	M Is the use of the chemical permitted with EU Ecolabel products? Consider further Appreved	N 12 (b) (7 50 150) is the hearardoon substance chemically modified during processing such that the restricted heard no longer exists No	0 1.1 (b) (If-0.1% and no chemical modification) is the presence of the haardous substance drepated and you met the derogation conditions? Yes	Tot

The first field to input information is in Column B. All process chemicals used by the applicant need to be listed because all chemicals require a declaration about the SVHCs. <u>One row is required for each restricted</u> <u>classification for each ingredient</u>. In some cases, this could quickly add up to a lot of rows for relatively few chemicals used. For example, if one chemical has two ingredients (X and Y) and ingredient X is classified as H317, H373 and H410, while ingredient Y is classified as H311 and H330, a total of six rows would be required (1 for the chemical as a whole formulation, 3 for ingredient X and 2 for ingredient Y). If the chemcial as a whole also had a restricted classification (i.e. the section 2 SDS type classification), this data would be inserted in the same row as used for the full chemical.

The example above shows 3 example entries Chemical A (as a mixture and with an entry for ingredient X), and Chemical B (no entry for specific ingredients therein). It is essential that each entry is covered by a safety data sheet (SDS) or a suitable declaration, which provides the same information that would appear in sections 2 and 3 of a SDS. The chemical identifiers should be entered in Columns D and E, although this might not always be available for chemical formulations. A declaration on SVHC comes in Column F. If a "Yes" is entered here it appears as red text, meaning that Chemical B does not meet the requirements (a "Fail" output should appear in Column P). There is no point continuing with the application if such a chemical is used for the EU Ecolabel products because there is no derogation made for SVHCs in Commission Decision (EU) 2021/476.

Following the entries for Chemical A, the first row shows that the mixture is actually classifed with a restricted hazard (H413) and that ingredient X in the same chemical is classified with the restricted H410 hazard.

Moving on to Column I, since the whole chemical is classified as H413, basically 100% of the chemical is counted. For ingredient X, this only constituted 2.5% of chemical A, so "2.5" is entered here. In Column J, the dosing rate of the whole chemical is requested, even if the entry is only relating to one ingredient in that chemical, so since the first to rows are about the same chemical, they have the same entry here (30 kg/t). There are no reasons to deviate from the default retention factor of 100%, so "100" is entered in Column K. The values in Columns I, J and K automatically generate a % concenctration in the product in Column L. If this Column L value is less than 0.1%, the entry "Approved" is automatically generated in Column M, and no



further entries are needed (a "Pass" output appears in Column P). This was the case for the "Chemical A – Ingredient X", but not "Chemical A" as a whole, in the screenshot example above.

In cases where "*Consider further*" appears in Column M, the cell in Column N turns green. If a "No" entry appears in Column N, then the cell in Column O will turn green. If a "No" entry also appears in Column O, this triggers a "Fail" output in Column P. If a "Yes" entry appears in either Column N or O, it will trigger a "Pass" output in Column P. It is necessary to check if the restricted chemical or ingredient is chemically modified such that the restricted hazard would be no longer relevant (Column N) or if the substance is derogated (Column O). If a "Yes" appears in either Column N or O, then the chemical, or ingredient in the chemcial, complies with criterion 1.2.

The excel sheet is simply a way of compiling data for restricted hazardous substances in a systematic way, following the logic below.



So in step 1, moving to the right hand side in the diagram means that the entry just needs to go up to the SVHC declaration (Column F). In step 2, going right in the diagram would correspond to the value in Column L being < 0.1%. Going right at step 3 in the diagram would correspond to a "Yes" entry in Column N and going right at step 4 would be equivalent to a "Yes" entry in Column O..



## Criterion 1.3. VOC emissions

#### (i) Interpretation of criterion:

Due to the cost of VOC emission testing, if worst case products can be clearly defined within the group of products covered by the EU Ecolabel application, then the test results for only these worst case products may be acceptable. Some arguments that might be used to justify a worst-case product are:

- dosed with the highest quantities of VOCs (in terms of grams of VOC per m2 of surface area)
- thinner formats with higher specific surface area (in terms of m2/kg)
- special surface treatments with VOC-containing chemicals compared to other products.

In cases where a broad range of products are covered by the same license, more than one worst case example will probably be necessary. For example, one worst case for blocks and one for tiles.

The EN 16516 standard is now well established and test reports should be according to this methodology rather than ISO 16000.

Because the VOC concentration in the chamber air gradually decreases with time, if the concentration limits are complied with after 3 days, or any time between 3 days and 28 days, the test can be stopped before the full 28 days. The shorter tests could translate into lower testing costs.

*The limits for total VOCs and formaldehyde should be quite straightforward to interpret. However, the R-value and Carcinogenic 1A and 1B VOCs merits some further explanation.* 

The R value is based on all VOCs detected that have been assigned an EU LCI value. For each substance with an EU LCI that is detected, a ratio is calculated (R<sub>i</sub>) by dividing the measured concentration by the EU LCI value: All the R<sub>i</sub> values from a test are then added together to generate the R value. A table with all substances with EU LCI values is provided below for reference. Even though it seems like a lot of substances to analyse for, the normal situation is that only a limited number of substances with EU LCI values will actually be detected from any one given product (if any are detected at all).

Carcinogenic 1A and 1B VOCs are to be considered in line with the Construction Products Regulation (EU) No 305/2011 and thus with EN 16516 and the decisions of CEN/TC 351. If there are any contradictions between the carcinogenic VOCs to be measured by EN 16516 and the technical definition of a VOC, then the EN 16516 standard should be preferentially recognised. EN 16516 (specifically in Annex H) provides an indicative list of carcinogenic VOCs, which is also produced below, after the list of substances with an EU LCI value. For the purposes of the EU Ecolabel criteria, formaldehyde and acetaldehyde concentrations can exceed 1  $\mu$ g/m3 (a separate 10  $\mu$ g/m3) limit applies for formaldehyde and both substances are counted as contributors to the R value if detected.

#### **Required documentation for Assessment and verification**

- Fill out the Declaration in the Parts C & D excel file worksheet for criterion 1.3. At least one entry is required, and the applicant needs to justify why each entry is representative of a worst case product.
- Provide a test report(s) from the laboratory where the VOC emission testing was carried out, in accordance with the conditions stipulated in EN 16516.



## **Reference** information

#### EU LCI values

Research into the identification of relevant substances and the appropriate EU LCI value has been ongoing for a number of years. As of December 2020<sup>3</sup> there are more than 150 substances with EU LCI values assigned. The full list substances with EU LCI values is currently as follows:

No.	CAS No.	Compound	EU LCI (µg/m3)	Status of EU-LCI value	Year of adoption
1		Aromatic hydro	carbons		
1-1	108-88-3	Toluene	2900	Derived	2013
1-2	100-41-4	Ethylbenzene	850	Derived	2013
	1330-20-7				
1.2	106-42-3	Xylene (o-, m-, p-) and mix of o-, m- and	500	Derived	2012
1-3	108-38-3	p-xylene isomers	500	Derived	2013
	95-47-6				
1-4	98-82-8	Isopropylbenzene (cumene)	1700	Derived	2017
1-5	103-65-1	n-Propylbenzene	950	Derived (read across)	2013
	108-67-8				
1-6	95-63-6	Trimethylbenzene (1,2,3-, 1,2,4-, 1,3,5-)	450	Derived	2013
	526-73-8				
1-7	611-14-3	2-Ethyltoluene	550	Derived (read across)	2014
	527-84-4	Cymene ( $\alpha$ - m- n-) (1-isopropyl-2(3.4)-			
1-8	535-77-3	methylbenzene) and mix of o-, m-, and p-	1000	Ascribed	2013
	99-87-6	cymene	2000		
	25155-15-1				
1-9	95-93-2	1,2,4,5-Tetramethylbenzene	250	Derived (read across)	2016
1-10	104-51-8	n-Butylbenzene	1100	Derived (read across)	2014
1-11	99-62-7 100-18-5	Diisopropylbenzene (1,3-, 1,4-)	750	Derived (read across)	2013
1-12	2189-60-8	Phenyl octane and isomers	1100	Derived (read across)	2013
1-16	100-42-5	Styrene	250	Derived	2013
1-17	98-83-9	2-Phenylpropene (α-methylstyrene)	1200	Derived	2018
1-18	637-50-3	1-Propenyl benzene (ß-methyl styrene)	1200	Derived (read across)	2019
	611-15-4				
1-20	100-80-1	Vinyl toluene (o-, m-, p-) and mix of o-,	1200	Derived	2018
1 20	622-97-9	m-, and p-vinyl toluene	1200	Denved	2010
	25013-15-4				
1-23	91-20-3	Naphthalene	10	Derived	2015
1-24	91-17-8	Decahydronaphthalene	200	Derived	2019
1-25	95-13-6	Indene	450	Ascribed	2013
2		Saturated aliphatic hydrocarbo	ons (n-, iso- a	and cyclo-)	
2-1	110-54-3	n-Hexane	4300	Derived	2016
2-2	110-82-7	Cyclohexane	6000	Ascribed	2013
2-3	108-87-2	Methyl cyclohexane	8100	Ascribed	2013
2-4	142-82-5	n-Heptane	15000	Derived	2018
2-5		Other saturated aliphatic hydrocarbons C6-C8	14000	Derived (read-across)	2018

<sup>3</sup> See: <u>https://ec.europa.eu/docsroom/documents/44905</u>



No.	CAS No.	Compound	EU LCI (µg/m3)	Status of EU-LCI value	Year of adoption			
2-6		Other saturated aliphatic hydrocarbons C9-C16	6000	Ascribed	2013			
3		Terpenes						
3-1	498-15-7	3-Carene	1500	Ascribed	2013			
3-2	80-56-8	α-Pinene	2500	Derived	2013			
3-3	127-91-3	ß-Pinene	1400	Ascribed	2013			
3-4	138-86-3 5989-27-5 5989-54-8	Limonene	5000	Derived	2014			
3-5		Other terpene hydrocarbons	1400	Ascribed	2013			
4		Aliphatic alco	hols					
4-1	75-65-0	2-Methyl-2-propanol (tert-butanol)	620	Ascribed	2013			
4-2	78-83-1	2-Methyl-1-propanol	11000	Derived	2016			
4-3	71-36-3	1-Butanol	3000	Ascribed	2013			
4-4	71-41-0 30899-19-5 94624-12-1 6032-29-7 584-02-1 137-32-6 123-51-3 598-75-4 75-85-4 75-85-4	1-Pentanol (all isomers)	730	Ascribed	2013			
4-5	111-27-3	1-Hexanol	2100	Ascribed	2013			
4-6	108-93-0	Cyclohexanol	2000	Ascribed	2013			
4-7	104-76-7	2-Ethyl-1-hexanol	300	Derived	2014			
4-8	111-87-5	1-Octanol	1700	Derived	2016			
4-9	123-42-2	4-Hydroxy-4-methyl-pentane-2-on (diacetone alcohol)	960	Ascribed	2013			
5		Aromatic alco	hols					
5-1	108-95-2	Phenol	70	Derived	2017			
5-2	128-37-0	BHT (2,6-di-tert-butyl-4-methylphenol)	100	Ascribed	2013			
5-3	100-51-6	Benzyl alcohol	440	Ascribed	2013			
6		Glycols, glycol ethers,	glycol ester	S				
6-1	107-21-1	Ethandiol (ethylenglykol)	3400	Derived	2016			
6-2*	96-49-1	Ethylene carbonate	4800	Derived (read-across)	2020			
6-3	7397-62-8	Butyl glycolate	900	Derived	2019			
6-4	111-46-6	Diethylene glycol	5700	Derived (read-across)	2016			
6-5	57-55-6	Propylene glycol (1,2-dihydroxypropane)	2100	Derived	2016			
6-7	623-84-7	Propylene glycol diacetate	1600	Derived (read-across)	2018			
6-8	110-98-5 25265-71-8	Dipropylene glycol	670	Ascribed	2013			
6-9	110-63-4	1,4-Butanediol	2000	Ascribed	2013			
6-10	107-41-5	Hexylene glycol (2-methyl-2,4- pentanediol)	3500	Derived	2018			
6-11	6846-50-0	2,2,4-Trimethylpentanediol diisobutyrate	1300	Derived	2018			
6-12	109-86-4	Ethylene glycol monomethyl ether (2-methoxyethanol)	100	Derived	2018			
6-13	110-49-6	2-Methoxyethyl acetate	150	Derived (read-across)	2018			
6-14*	110-71-4	1,2-Dimethoxyethane	100	Derived	2020			
6-15	111-96-6	Diethylene glycol dimethyl ether (1-methoxy-2-(2-methoxy-ethoxy)-	28	Ascribed	2013			



No.	CAS No.	Compound	EU LCI (µg/m3)	Status of EU-LCI value	Year of adoption
		ethane)			
6-16	25265-77-4	2,2,4-Trimethyl-1,3-pentanediol monoisobutyrate	850	Derived	2018
6-17	109-59-1	Ethylene glycol isopropylether (2- methylethoxyethanol)	220	Ascribed	2013
6-18	112-49-2	Triethylene glycol-dimethyl ether	150	Derived	2019
6-19	110-80-5	Ethylene glycol monoethyl ether (2-ethoxyethanol)	600	Derived	2016
6-20	111-15-9	2-Ethoxyethyl acetate	900	Derived (read-across)	2016
6-21*	629-14-1	1,2-Diethoxyethane	150	Derived	2020
6-22	111-90-0	Diethylene glycol monoethyl ether (2-(2- ethoxyethoxy)ethanol)	350	Ascribed	2013
6-23	2807-30-9	Ethylene glycol monoisopropyl ether (2- propoxyethanol)	860	Ascribed	2013
6-24	111-76-2	Ethylene glycol monobutylether (2-butoxyethanol)	1600	Derived	2016
6-25	112-07-2	2-Butoxyethyl acetate	2200	Derived (read-across)	2016
6-26	112-34-5	Diethylene glycol monobutylether	350	Derived	2019
6-27	124-17-4	Diethylene glycol monomethyl ether acetate (butyldiglykolacetate, 2-(2- butoxyethoxy) ethyl acetate)	850	Ascribed	2013
6-28	122-99-6	2-Phenoxyethanol	60	Derived	2016
6-29	112-25-4	Ethylene glycol n-hexyl ether (2-hexoxyethanol)	900	Derived	2019
6-30	112-59-4	Diethylene glycol n-hexyl ether (2-(2- hexoxyethoxy)-ethanol)	400	Derived (read-across)	2019
6-31	107-98-2	Propylene glycol monomethyl ether (1-methoxy-2-propanol)	7900	Derived	2018
6-32	1589-47-5	1-Propylene glycol 2-methyl ether (2- methoxy-1-propanol)	19	Ascribed	2013
6-33	70657-70-4	1-Propylene glycol 2-methyl ether acetate (2-methoxy-1-propyl acetate)	28	Ascribed	2013
6-34	7778-85-0	1,2-Propylene glycol dimethyl ether	500	Derived	2019
6-35	34590-94-8	Dipropylene glycol monomethyl ether	3100	Ascribed	2013
6-36	88917-22-0	Dipropylene glycol monomethyl ether acetate	950	Derived (read-across)	2019
6-37	29911-27-1	Dipropylene glycol mono-n-propylether	200	Derived (read-across)	2019
6-38	29911-28-2 35884-42-5 132739-31-2	Dipropylene glycol mono-n(t)-butylether	250	Derived	2019
6-39	20324-33-8 25498-49-1	Tripropylene glycol mono-methylether	1200	Derived	2018
6-40	63019-84-1 89399-28-0 111109-77-4	Dipropylene glycol dimethyl ether	1300	Ascribed	2013
6-43	5131-66-8 29387-86-8 15821-83-7 63716-40-5	1,2-Propylene glycol n-butylether	650	Derived	2018
6-44	104-68-7	Diethylene glycol phenylether	80	Derived (read-across)	2019
6-45*	126-30-7	Neopentyl glycol	8700	Derived	2020
7		Aldehyde	S		
7-1	50-00-0	Formaldehyde	100	Derived	2016



No.	CAS No.	Compound	Status of EU-LCI value	Year of adoption				
7-2*	75-07-0	Acetaldebyde	300	Derived	2020			
7_3	123-38-6	Propagal	650	Derived	2018			
7-4	123-72-8	Butanal	650	Derived	2013			
7-5	110-62-3	Pentanal	800	Derived (read-across)	2013			
7-6	66-25-1	Hexanal	900	Derived (read-across)	2013			
7-7	111-71-7	Hentanal	900	Derived (read-across)	2013			
7-8	123-05-7	2-Ethyl-hexanal	900	Derived (read-across)	2013			
7-9	124-13-0	Octanal	900	Derived (read-across)	2013			
7-10	124-19-6	Nonanal	900	Derived (read-across)	2013			
7-11	112-31-2	Decanal	900	Derived (read-across)	2013			
	4170-30-3							
7-12	123-73-9	2-Butenal (crotonaldehvd)	5	Derived	2015			
	15798-64-8							
	1576-87-0							
7-13	764-39-6	2-Pentenal	7	Derived (read-across)	2015			
	31424-04-1			. ,				
	6728-26-3							
	505-57-7							
7-14	16635-54-4	Hexenal	7	Derived (read-across)	2015			
	1335-39-3				1			
	73543-95-0							
	2463-63-0							
7-15	18829-55-5	2-Hentenal	7	Derived (read-across)	2015			
/ 15	57266-86-1		'	Derived (read across)	2013			
	29381-66-6							
	2363-89-5							
7-16	2548-87-0	2-Octenal	7	Derived (read-across)	2015			
	25447-69-2							
	20664-46-4							
	2463-53-8		_		2015			
/-1/	18829-56-6	2-Nonenal	/	Derived (read-across)				
	60784-31-8							
7 10	3913-71-1		7	Darived (read acress)	2015			
7-18	2497-25-8	2-Decenal	/	Derived (read-across)	2015			
	3913-81-3							
7 10	2403-77-0	2 Undecenal	7	Darived (read across)	2015			
7-19	1227_82_2	2-Ondecental	'	Deriveu (reau-across)	2015			
7-20	98-01-1	Furfural	10	Derived	2017			
7-20	111_20_8	Glutaraldebyde	10	Derived	2017			
0	111-50-8	Katanas	-	Derived	2018			
ŏ		Ketones						
8-1	78-93-3	2-Butanone (ethylmethylketone)	20000	Derived	2016			
8-2	563-80-4	3-Methyl-2-butanone	7000	Ascribed	2013			
8-3	108-10-1	4-Methyl-2-pentanone	1000	Derived	2016			
		(methylisobutylketone)						
8-4*	120-92-3	Cyclopentanone	1200	Derived	2020			
8-5	108-94-1	Cyclohexanone	410	Ascribed	2013			
8-6*	1120-72-5	2-Methylcyclopentanone	1400	Derived(read-across)	2020			
8-7	583-60-8	2-Methylcyclohexanone	2300	Ascribed	2013			
8-8	98-86-2	Acetophenone	490	Ascribed	2013			
8-9	116-09-6	1-Hydroxyacetone (1-hydroxy-2-	2100	Derived (read-across)	2019			
		propanone)			2013			
8-10	67-64-1	Acetone	120000	Derived	2018			
9		Acids						
9-1	64-19-7	Acetic acid	1200	Derived	2016			



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No.	CAS No.	Compound	EU LCI (µg/m3)	Status of EU-LCI value	Year of adoption			
9-2	79-09-4	Propionic acid	1500	Derived	2016			
9-3	79-31-2	Isobutanoic acid (isobutyric acid)	1800	Derived (read-across)	2018			
9-4	107-92-6	Butanoic acid (butyric acid)	1800	Derived (read-across)	2018			
9-5	75-98-9	2,2-Dimethylpropanoic acid (pivalic acid)	2100	Derived (read-across)	2018			
9-6	109-52-4	n-Pentanoic acid (valeric acid)	2100	Derived (read-across)	2018			
9-7	142-62-1	n-Hexanoic acid (caproic acid)	2100	Derived (read-across)	2018			
9-8	111-14-8	n-Heptanoic acid	2100	Derived (read-across)	2018			
9-9	124-07-2	n-Octanoic acid	2100	Derived (read-across)	2018			
9-10	149-57-5	2-Ethylhexanoic acid	150	Derived	2014			
10		Esters	Γ		ſ			
10-1	108-21-4	Propyl acetate (n-, iso-)	4200	Ascribed	2013			
10-2	108-65-6	2-Methoxy-1-methylethyl acetate	650	Derived	2019			
10-5	80-62-6	Methyl methacrylate	750	Derived	2016			
10-7	110-19-0	Isobutyl acetate	4800	Ascribed	2013			
10-8	123-86-4	n-Butyl acetate	4800	Ascribed	2013			
10-9	103-09-3	2-Ethylhexyl acetate	350	Derived (read-across)	2018			
10-10	96-33-3	Methyl acrylate	180	Ascribed	2013			
10-11	140-88-5	Ethyl acrylate	200	Ascribed	2013			
10-12	141-32-2	n-Butyl acrylate	110	Ascribed	2013			
10-13	103-11-7	2-Ethylhexyl acrylate	380	Ascribed	2013			
10-14		Other acrylates (acrylic acid esters)	110	Ascribed EU-LCI	2013			
10-15	627-93-0	Dimethyl adipate	50	Ascribed	2013			
10-16*	106-65-0	Dimethyl succinate	20	Derived	2020			
10-17*	1119-40-0	Dimethyl glutarate	25	Derived	2020			
10-18*	71195-64-7	Diisobutyl glutarate	35	Derived (read-across)	2020			
10-19*	925-06-4	Diisobutyl succinate	35	Derived (read-across)	2020			
10-20	105-75-9	Dibutyl fumarate	50	Ascribed	2013			
10-21	105-76-0	Maleic acid dibutylester	50	Ascribed	2013			
10-22	13048-33-4	Hexamethylene diacrylate	10	Ascribed	2013			
10-23	96-48-0	Butyrolactone	2800	Derived	2018			
11		Chlorinated hydrocarbons						
11-1	127-18-4	Tetrachloroethene	80	Derived	2018			
11-3	106-46-7	1,4-Dichlorobenzene	150	Derived	2013			
12		Others						
12-1	123-91-1	1,4-Dioxane	400	Derived	2015			
12-2	105-60-2	Caprolactame	300	Derived	2013			
12-3	872-50-4	N-Methyl-2-pyrrolidone	1800	Derived	2016			
12-4	556-67-2	Octamethylcyclotetrasiloxane (D4)	1200	Ascribed	2013			
12-7	100-97-0	Hexamethylenetetramine	30	Ascribed	2013			
12-8	96-29-7	2-Butanonoxime	15	Derived	2015			
12-9	126-73-8	Tributyl phosphate	300	Derived	2016			
12-11	26172-55-4	5-Chloro-2-methyl-2H-isothiazol-3-one (CIT)	1	Ascribed	2013			
12-12	2682-20-4	2-Methyl-4-isothiazolin-3-one (MIT)	100	Ascribed	2013			
12-13	121-44-8	Triethylamine	60	Derived	2017			
12-14	109-99-9	Tetrahydrofuran	500	Derived	2018			
12-17	2687-91-4	N-Ethyl-2-pyrrolidone	400	Derived	2016			

\*new or updated entries

The list above may be subject to periodic revision and so should be considered as indicative only. Any updates could be checked for on the DG GROW website (see: <u>https://ec.europa.eu/growth/sectors/construction/eu-lci/values\_en</u>) or from other sources.



#### **Carcinogenic VOCs**

The list below is in line with Annex H of EN 16516. However, the standard states that this list is non-exhaustive and informative. Unless decided otherwise by CEN/TC 351, for the purposes of demonstrating compliance with criterion 1.3 of <u>Commission Decision 2021/476</u> for the award of the EU Ecolabel to hard covering products, the  $1 \mu g/m3$  limit shall apply to each of the 40 VOCs listed below.

No.	CAS No.	Chemical name	No.	CAS No.	Chemical name
1.	79-06-1	Acrylamide	21.	120-71-8	6-Methoxy-m-toluidine
2.	107-13-1	Acrylonitrile	22.	592-62-1	Methyl azoxy methyl acetate
3.	71-43-2	Benzene	23.	838-88-0	4,4-Methylene di-o-toluidine
4.	1464-53-5	2,2'-Bioxirane	24.	79-46-9	2-Nitropropane
5.	542-88-1	Bis (chloromethyl) ether	25.	621-64-7	Nitrosodipropylamine
6.	106-47-8	4-Chloroaniline	26.	1116-54-7	2,2'-(Nitrosoimino)bisethanol
7.	106-89-8	Epichlorohydrine	27.	88-72-2	2-Nitrotoluene
8.	51594-55-9	(R)-(-)-Epichlorohydrine	28.	122-60-1	Phenyl glycidyl ether
9.	95-69-2	4-Chloro-2-methylaniline	29.	1120-71-4	3-Propanesultone
10.	100-44-7	Benzyl chloride	30.	91-22-5	Quinoline
11.	96-12-8	1,2-Dibromo-3-chloropropane	31.	94-59-7	5-Allyl-1,3-benzodioxole
12.	106-93-4	1,2-Dibromoethane	32.	96-09-3	Styrene oxide
13.	764-41-0	1,4-Dichlorobut-2-ene	33.	95-06-7	Sulfallate
14.	107-06-2	Ethylene dichloride	34.	5216-25-1	4-Chlorobenzotrichloride
15.	78-87-5	1,2-dichloropropane;	35.	95-53-4	o-Toluidine
		propylene dichloride			
16.	96-23-1	1,3-Dichloro-2-propanol	36.	79-01-6	Trichloroethylene
17.	79-44-7	Dimethylcarbamoyl chloride	37.	96-18-4	1,2,3-Trichloropropane
18.	540-73-8	N,N'-Dimethylhydrazine;	38.	98-07-7	Benzotrichloride
		1,2-Dimethylhydrazine			
19.	680-31-9	Hexamethylphosphoric triamide	39.	137-17-7	2,4,5-Trimethylaniline
20.	90-04-0	2-Methoxyaniline	40.	51-79-6	Urethane

The latest version of the list should apply for the date when testing was carried out, and the test date(s) should not be more than 12 months before the date of application.



## Criterion 1.4. Fitness for use

#### (i) Interpretation of criterion:

Quality management systems are defined in EN ISO 9000 and ISO 9001. The definitions are broadly set to potentially apply to any organisation.

The fitness for use criterion for hard covering products aligns with these principles by requesting proof of the quality control and quality assessment procedure in place. The simplest way to do this would be to show the ISO 9001 certificate for the production site(s) of the applicant.

However, it is important to note that ISO 9001 certification is not essential. If similar in-house systems have been set up, these can be described to the Competent Body.

With regards to Quality Management of the production process, the description may include many different aspects, of which the following would be most expected:

- define the production process and the objectives of each part or unit of the production system

- define the roles, responsibilities and accountabilities for the production process as a whole and its distinctive parts

- define the capacity of the process and the capability of the organisation, in terms of production
- explain how the different processes in the production system are related and interdependent
- explain how processes are monitored and controlled
- explain how quality of products is assessed

The procedure for handling customer complaints should be straightforward to describe (especially in small to medium enterprises operating at regional or national level).

Any fitness for use requirements should be well understood by applicants since almost all products would need to carry a CE marking, because of the existence of the Construction Products Regulation and the fact that the scope mainly refers to construction products. Non-construction products that are in the scope, namely kitchen worktops, table-tops and vanity tops, do not need a CE marking since they could be described as furniture products.

Whether there is a CE marking or not, applicants should identify any relevant fitness for use standards that have been applied to some or all of the products covered by the application.

#### Required documentation for Assessment and verification

- Fill out the Declaration in the Parts C & D excel file worksheet for criterion 1.4.
- A copy of the ISO 9001 certificate or a description of the in-house Quality Management System.
- A description and/or copy of the customer complaints handling procedure.



## Criterion 1.5. User information

#### (i) Interpretation of criterion:

Flexibility is given to applicants about how exactly to make user information available to clients and users. The one necessity is that user information must be made available in electronic format that can be accessed via the internet, without any access restrictions. The main reason for this is because the installers and end users may not necessarily be the people who originally purchased the product

The information should ideally also be made available in paper format with the physically purchased product, in the official language of where the product is placed on the market. However, in cases where products are exported globally, it would be more practical to substitute a multi-lingual paper copy of user information for a QR code on the packaging and/or on invoices, clearly stating that this is a link to user information for the product(s).

The user information needs to include, as a minimum:

- details about relevant technical performance
- details about correct preparation and installation
- instructions on proper cleaning and maintenance
- information about correct disposal (of both product and packaging materials)

In cases where many different products are covered by the application, only a sample of user information should be necessary – although it would ultimately be up to the Competent Body to decide how many samples are sufficiently representative.

#### Required documentation for Assessment and verification

Fill out the Declaration in the Parts C & D excel file worksheet for criterion 1.5.

Representative samples of the user information.



## Criterion 1.6. Information appearing on the EU Ecolabel

The guidelines for the use of the optional label with text box can be found in the "Guidelines for use of the Ecolabel logo" at: <u>http://ec.europa.eu/environment/ecolabel/documents/logo\_guidelines.pdf</u>

### (i) Interpretation of criterion:

The relevant information indicated by Criterion 1.6 shall appear on the packaging for the product(s), regardless of whether this is a Business to Business (B2B) or Business to Consumer (B2C) product.

The applicant shall follow the instructions on how to properly use the EU Ecolabel logo provided in the EU Ecolabel Logo Guidelines:

If the optional label with text box is used, it shall contain the three statements mentioned in the criteria document. No other statements can be used in the box, but applicants are obviously free to provide additional information on other parts of the packaging.

#### Required documentation for Assessment and verification

Fill out the Declaration in the Parts C & D excel file worksheet for criterion 1.6.

Image(s) of product packaging that are representative of the products covered by the application.

## Criterion 1.7. Environmental Management System (optional)

#### (i) Interpretation of criterion:

Because this criterion is optional, there is no need to submit any information or declaration. However, if no indication is provided, 0 points shall be awarded for the criterion by default. If the site(s) where the products are produced are covered by EMAS registration, 5 points shall be awarded. If the site is not EMAS registered but is certified according to ISO 14001, 3 points shall be awarded. In all other cases, 0 points shall be awarded.

Points for the Environment Management System should only be counted for the sites covered by the applicant. This has a potential implication for transformed natural stone products and precast concretes in cases where the intermediate product has already been awarded the EU Ecolabel and part of the points total for the intermediate product was due to criterion 1.7.

In such cases, the supplier of the intermediate product or the competent body that awarded the license for the intermediate product should confirm the points total and if any points were due to criterion 1.7.

#### Required documentation for Assessment and verification

Fill out the Declaration in the Parts C & D excel file worksheet for criterion 1.7.



Provide a copy of the ISO 14001 certification or documentation relating to EMAS registration.



# Natural stone product criteria

## Criterion 2.1 – Energy consumption at the quarry

#### (i) Interpretation of criterion:

#### Mandatory part

The mandatory element of this criterion is to implement a plan to systematically monitor, record and reduce specific energy consumption and specific CO2 emissions. The monitoring and recording system should amount to an inventory of fuel and electricity consumption and of production output. Evidence of electricity consumption should come from meter readings and bills. The monitoring of fuel consumption will depend on how fuel is handled onsite, but delivery notes, receipts and invoices will normally be the most appropriate way. Production output should be self-explanatory, referring to actual saleable products.

The energy inventory for the quarry needs to cover a period of at least <u>12 months prior to the date of award</u> <u>of the EU Ecolabel.</u> Because it was not possible to identify concrete benchmarks of energy consumption per unit of production output during background research, no pass/fail limit has been set in the criterion. So the main challenge is simply to gather the data in the first place. In cases where the data collection is something new for the applicant, it is recommended to start the application prior to the inventory having 12 months of data (e.g. a 6 month inventory might work at the beginning of the application process if the processing of the application and <u>award of the EU Ecolabel</u> was to take another 6 months – presuming that the inventory is kept up to date during the application process).

The CO2 footprint for consumed electricity should be specified, so that it can be translated into CO2 footprints. If more than one electricity source is used and each has a different CO2 footprint, a weighted average CO2 footprint should be used. The type or types of fuel used should also be specified, for the same purpose.

If fuel is converted to electricity onsite (e.g. diesel generators) this should only be counted once, as the primary energy source (i.e. the fuel). If a combination of renewable electricity generated onsite and grid electricity is used, the metering should be set up so that all <u>consumption onsite</u> can be counted, regardless of where it comes from and if it is associated with a bill or not.

Care should be taken about the scope for fuel consumption, especially if the fuel consumption of vehicles that travel offsite is included or not. The simplest option would be to exclude vehicles that are used offsite, as this could be influenced by factors that are not related to the production process (e.g. employee travel to homes and elsewhere). However, the criterion leaves it up to the applicant to define the exact scope and then to apply it consistently.

#### Renewable energy (15 points in total)

For clarity, the first 10 points that are available refer to the share of renewable energy (i.e. electricity plus fuel). The next 5 points refer to how renewable electricity is sourced, <u>regardless of how much of the total electricity is due to renewables</u>. In cases where renewable electricity comes from more than one type of contracting (e.g. onsite generated via PV panels and a share of renewables in a green tariff from the utility supplier) the source that accounts for the largest share of renewable electricity shall be chosen.

#### Carbon footprint analysis (5 points in total)

The information required in criterion 2.1 (together with information about other criteria) could be used as a



basis for a carbon footprint analysis. If such an analysis has been done in line with ISO 14067, 3 points shall be awarded. If it has been done in accordance with PEF methodology, 5 points shall be awarded. Any other methods used will not result in the awarding of points unless a suitable equivalence can be justified to the Competent Body.

## How the interface looks in the Parts C & D excel worksheet

Since there are a number of cells that require entries for indicator 2.1, it is worth presenting how the cells appear in the Parts C & D excel worksheet.

	4	В		С		D	EF	G	Н	I J
1	EU Ecolabel hard covering products									
2	Type of produc	t subject to the app	lication:	Natural stone (intermediate bl	lock/slab from	n quarry)				
4	Reference nam	e for data entru		· ·						
	Has an energy i	nventory been kept fo	r fuel and							
5	electricity consu	umption at the quarry?		Yes						
	Is there a plan t	o reduce specific ener	gy							
6	consumption ar	nd CO2 emissions at t	he quarry?	Yes						
7	Key dat	a from energy inve	ntory	Data input		Units	[	Points		
8	Time period of	data collection:								
9	Approximate de	ensity of stone:		2450		kg/m3				
10	Material extracto	ed during this time pe	riod:	450		m3				
11	Of which has b	een sold or is ready fo	r sale:	200		m3				
12	Material extracto	ed during this time pe	riod:	1102.5		tonnes				
13	Of which has b	een sold or is ready fo	r sale:	490		tonnes				
14	Total electricity	consumption:		50000		kWh	[	356	gCO2 eq./l	kWh
15	Total electricity	CO2:		17800		kgCO2 eq.				
16	Fuel-1 consump	otion (quantity):		100		Units	[	40	MJ unit of	fuel-1
17	Fuel-1 consump	otion (energy):		4000		MJ	1	100	g CO2 eq.	/MJ fuel-1
18	Fuel-1CO2 emi	ssions		400		kgCO2 eq.				
19	Fuel-2 consump	otion (quantity):		100		Units	[	50	MJ/unit of	fuel-2
20	Fuel-2 consumption (energy):		5000		MJ		100	g CO2 eq.	/MJ fuel-2	
21	Fuel-2 CO2 emissions		500		kgCO2 eq.					
22	Fuel-3 consumption (quantity):		100		Units	[	40	MJ unit of	fuel-3	
23	Fuel-3 consumption (energy):		4000		MJ	1	200	g CO2 eq.	/MJ fuel-3	
24	Fuel-3 CO2 emissions		800		kqCO2 eq.					
25	5 Total fuel consumption (energy):			13000		MJ				
26	5 Total fuel CO2:		1700		kaCO2 ea.					
27	Total energy co	nsumption (kWh)		53611		kWh				
28	Total energy co	nsumption (MJ)		193000		MJ				
29	Total CO2:			19500		ka CO2 ea.				
30	Specific energy consumption (kWhm3)		n3)	268.1		kWh/m3				
31	Specific energy	consumption (kWh/t)		109.4		kWh/tonne				
32	Specific energy consumption (M. Iro3)		965.0		MJ/m3					
33	Specific energy consumption (MJt)			393.9		MJItonne				
34	Specific CO2 (per m3)			97.5	k	a CO2 ea./m3				
35	Specific CO2 (per tonne)		3.5	ka	CO2 ea./tonne					
36	Percentage of energy that is renewable			60		%		6.00	out of 10	1
37	Type of renewable electricity used (if any)		Long term corporate purchase agreements for grid- connected or remote grid renewables;			4.00	out of 5			
	Has an ISO 140	67 or PEF method ana								
	products carbon footrpint/global warming impa		ning impact	No			0.00	out of 5		
38	38 been carried out?									
	→ Summary Horizontal 1.1 to 1.7 Natural stone 2			2.	1 to 2	2.11	VLO			

Cells in green must be filled out and cells in red generate results automatically. The first green cell (C4) refers to the name that will be associated with the data entry (it could simply be the name of the quarry and a reference year). In cells C5 and C6, the applicant is required to confirm that they are meeting the mandatory elements of criterion 2.1. It should be noted that the competent body may ask for more details about what is behind the "Yes" entries to C5 and C6.



The next 6 rows that define the period and the quantities of material extracted and production output (i.e. of saleable products). The approximate density of the stone is important for converting units from m3 to tonnes. In cases where more than one stone density applies, the applicant should estimate a weighted average stone density for products covered by the same energy data.

At cell C14, the first input relating to energy consumption appears (electricity, in kWh). An input is also required for the carbon factor of the electricity used (in gCO2 eq. per kWh). This will automatically generate a total electricity CO2 in cell C15. With fuel consumption, it is necessary to define the quantity of fuel consumed (in volume or mass) and then to define both the calorific value of the fuel and the carbon factor of the fuel. This will define 2 outputs: for total fuel energy and for total fuel CO2 (in cells C17 and C18 respectively). Since each fuel has its own specific calorific value and carbon factor, it might be complicated to make a weighted average estimation. For this reason, scope is made in the excel file to define 3 separate fuel inputs.

If multiple electricty sources and fuel sources are used, these numbers should be detailed separately (meter readings, invoices etc.) and made available to the Competent Body upon request. The CO2 factors for the fuel and electricity should be based on information from the suppliers. In cases of doubt about fuel factors, the values in Annex VI to Commission Implementing Regulation (EU) 2018/2066 could be used.

The next rows are simply the automatically calculated totals for energy (in kWh and in MJ) and CO2 (in kg) and specific energy and CO2 (in kWh, MJ and kgCO2 per tonne and per m3). The automatic calculations for total energy (i.e. fuel plus electricity) already take into account the conversion factor for kWh and MJ (i.e. 1kWh = 3.6 MJ). The values in cells C33 and C35 are automatically shown in the "Summary worksheet".

It should be noted that the specific energy consumption is based on the total saleable material extracted and NOT the total material extracted. So one way to improve specific energy consumption and specific CO2 emissions is to improve material extraction efficiency (see criterion 2.2 for more details about what exactly should be considered as saleable products and by-products).

The final three rows are where points are awarded. The first one relates to the share of renewable energy (i.e. fuel plus electricity). The next row is about the major mechanism for contracting renewable electricity and the final row is about if and how a carbon footprint has been carried out for the products.

By obtaining the data necessary to fill out the excel sheet for criterion 2.1, most of the key information needed for doing a carbon footprint analysis has been done already. So applicants are encouraged (but not obliged) to go a step further in order to obtain an extra 3 or 5 points.

#### Required documentation for Assessment and verification:

- (Upon request) a copy of the fuel and electricity inventory for the relevant period where data was submitted, which also explains the scope of processes and operations covered by the inventory.
- (Upon request) a copy of the plan to reduce specific energy consumption and CO2 emissions for production output.
- Fill out the Parts C & D excel file worksheet for criterion 2.1, specifying the quantity of material extracted, the saleable material obtained and the total fuel and electricity consumption during the same period.
- (Upon request) copies of meter readings, bills and invoices for electricity and fuel to justify the numbers entered.



- A written breakdown of the different fuel and electricity sources used (if relevant), and how the carbon factors were calculated and how the % renewables was estimated.
- A copy of the electricity supply contract or other written evidence that would justify any claims for onsite or near-site renewables.
- (If points are claimed) A copy of the carbon footprint certificate or EPD, stating that the method is in line with ISO 14067 or PEF.



## Criterion 2.2 – Material efficiency at the quarry

#### (i) Interpretation of criterion:

To generate the material extraction efficiency at the quarry over a defined period, it is necessary to know three things:

- the total quantity of material extracted (A)
- the total quantity of saleable blocks (or slabs) produced (B)
- the total quantity of saleable by-products produced (C)

While the value of A should be easy to estimate, as it is linked in part to operating permits and can be visually assessed by inspecting the quarry front(s), the other two (B and C) are more difficult, because they are linked to sales. Sale of material might refer to material extracted during the data collection period or from a stockpile of already extracted material that has been stored at the quarry for several years. Conversely, material might be extracted during a period of low sales, causing a stockpile to build up onsite and an apparently low efficiency of material extraction.

For these reasons, it is best if the quantities for B and C refer to "saleable" blocks (and slabs) and "saleable" by-products, respectively. By "saleable", it is meant that these products/by-products have sufficient quality and characteristics in order to be sold (not given away for free). This judgment should be justified based on previous commercial experience of the quarry operator.



The exact volumes of C, D and E can only be estimated, since they will consist of a range of irregular pieces of stone blocks, fragments and dust. As a check however, C+D+E cannot be greater than A-B for the data collection period. Estimates of C, D and E should be based on the density of the stone material and the bulk packing density of the material in the BDPA and EWDA. For clarity, quarry operators should never send potentially saleable by-products to the EWDA. Data should be collected for at least 12 consecutive months. Longer periods of data collection shall also be permitted.

The material flows in the quarry should be set out as follows:



## How the interface looks in the Parts C & D excel worksheet

Since there are a number of cells that require entries for indicator 2.2, it is worth presenting how the cells appear in the Parts C & D excel worksheet.

A	в	С	D	EFG	H I						
1	EU Ecolabel hard covering products										
2	Type of product subject to the application:	Natural stone (intermediate block/slab from quarry)									
40											
41	Criterion 2.2. Material efficiency at the quarry										
42	Reference name for data entry			_							
43	Key data from material inventory	Data input	Units		_						
44	Time period of data collection:		nla	Check							
45	A: Total quantity of material extracted:	1000	m3	700	(A-B check)						
46	B: Saleable blocks produced from A:	300	m3	700	(C+D+E check	<)					
47	C: Total quantity of by-products sold:	350	m3	0	Balance check	<					
48	D: Total quantity of extractive waste used internally	. 100	m3								
	E: Total quantity of extractive waste transferred to the extractive waste deposition area or by- products transferred to the by-products	250	m3	Points							
49	deposition area:										
50	Extraction efficiency ratio:	0.65	nla	7.50							
51											

A total of 5 inputs are needed for the excel worksheet for criterion 2.2 plus two optional inputs.. Each input should be linked to a material flow inventory of the quarry. Such an inventory should track the movements of extracted materials into the following destinations: saleable products; saleable by-products; internally used by-products and stored or disposed of extractive wastes.

The monitoring period should be at least 12 months, but longer periods are also permitted. Whatever the monitoring period is, it should be specified in the cell C44. During this period, the inventory should be compiled with material flows in such a way that it is straightforward to calculate the values for A, B, C, D and E. A copy of the inventory should be made available to the Competent Body upon request.

It is important to note that A-B should be equal to C+D+E, but only if the applicant has actually reported for D and E, which are optional. In reality these numbers will never match perfectly, even with the best efforts to accurately obtain data, due to inaccuracies in estimates of material flows, inaccuracies in estimates of bulk densities and due to losses of material as windblown dust and rainfall carrying fines away. So whether the numbers match or not is purely for information and to highlight any obvious problems with estimations.

If applicants report on the flows for "D" and "E" and they wish to revise their numbers to approximate towards a balance check of zero, the estimates for D and/or E should be revised and not the estimates for A, B or C.

#### Required documentation for Assessment and verification:

- (Upon request) a copy of the material flow inventory for the relevant period where data was submitted, which also explains the scope of processes and operations covered by the inventory.
- Fill out Parts C & D excel file worksheet for criterion 2.2, specifying the quantity of material extracted, the saleable products and by-products obtained, by-products and extractive waste used onsite and extractive waste disposed of or stored onsite.


### Criterion 2.3 – Water/wastewater management at the quarry

#### (i) Interpretation of criterion:

A description of how water is used in the quarry shall be provided to the Competent Body. This description shall cover, as a minimum, the following aspects:

- how does stormwater flow and drain on the site
- what processes actually consume water at the quarry
- how water is supplied to the quarry processes
- what happens to the process wastewater (how is it treated and recirculated)
- what happens to the wastewater sludge (how is it stored and where does it end up)

A visual description of the site should also be included. For example, a satellite photograph, with indications pasted on top about the locations and routing of any water and wastewater flows would be a useful basis for a description. Upon request, photos and technical drawings of any process wastewater treatment equipment should also be provided.

#### Required documentation for Assessment and verification:

- Description of how stormwater flows and how process water is supplied, treated and disposed of onsite.
- Fill out the Parts C & D excel file worksheet for criterion 2.3.
- l (Upon request) photos and technical drawings of any wastewater treatment equipment.

### Criterion 2.4 – Dust control at the quarry

#### (i) Interpretation of criterion:

A description of the main sources of dust emission and how operational site measures for dust control have been implemented needs to be provided. The description should cover each of the points in criterion 2.4. The only exception to this is potentially the 2<sup>nd</sup> point, where underground quarries might not need such a plan.

When the description makes reference to training about good practice for dust control, a copy of this material should be provided to the Competent Body upon request Details of the medical check-up program for employees should also be included.

- A description of the site processes that generate dust emissions and the measures in place to reduce the emissions of dust from the quarry.
- (Upon request) copies of training material and the medical check program for employees.
- Fill out the Parts C & D excel file worksheet for criterion 2.4.



# Criterion 2.5 – Personnel safety and working conditions at the quarry

#### (i) Interpretation of criterion:

The applicant needs to provide a copy of their occupational health and safety policy. This policy must cover each of the points listed in criterion 2.5. If some points are missing from the policy, then an updated policy must be provided or a supplementary declaration that provides the required information.

Photos and/or technical drawings of the equipment and safety features onsite should also be provided. A map of the site should be provided, indicating where toilets, changing rooms and lunchroom facilities are located. It is possible that these facilities might not be physically on the quarry site but be centralised facilities for multiple quarries operating in the same locality.

- A copy of the occupational health and safety policy, with any supplementary information, as necessary
- Fill out the Parts C & D excel file worksheet for criterion 2.5.
- (If in EU) A declaration of compliance with national laws and EU regulations about health and safety legislation and worker rights.
- (If outside EU) A declaration of compliance with national laws about health and safety legislation and worker rights, plus a third party certified verification that the fundamental ILO conventions are respected.
- Copies of labour contracts for workers.



## Criterion 2.6 – Quarry landscape impact ratios (optional)

#### () Interpretation of criterion:

Quarries can have a wide range of different appearances, depending on the topography of the site, the topography of the surrounding areas and where the material to be extracted is located. Because this criterion can favour some types of sites over others, it is an optional criterion. Nevertheless, it can encourage the ongoing remediation of inactive areas and the installation of renewable energy infrastructure on all sites.

This criterion looks at the different surface areas of a quarry from an aerial or satellite view. Ideally the whole quarry area (TAA) can be split into QF (active Quarry Front), EWDA (Extractive Waste Deposition Area, BPDA (By-Products Deposition Area, BA (Biodiverse Area) and REA (Renewable Energy Area). Some further information about how the areas should be counted is provided below.

The QF can be considered as the active working area. Although in reality the working area can vary from one day to the next, it should be considered as all areas that need to be kept free for the extraction activity. So the QF does not only include the steps where the material is currently being extracted, but also any access ramps and pathways for vehicles and machinery to get to the quarry front and to transport materials to the EWDA, to the BPDA and to the quarry gate.

The EWDA must be clearly defined on a satellite view of the quarry. The more efficient the extraction process, the less EW is produced and the smaller the EWDA needs to be. Likewise, a more efficient packing of EW and finding reuse applications for EW will reduce the necessary EWDA. For example, EW could be used for building ramps, for building wind-breaks or for delineating access roads in and around the boundary of the site. Additionally, EW could be sent to a communal inert landfill or EWDA that is shared by numerous small quarries in the same place. This last point could potentially reduce the necessary EWDA to almost zero, depending on how frequently the EW is transported offsite. If EW is indeed sent offsite for disposal, this should be logged and the communal EWDA or landfill(s) identified.

The BPDA area must also be clearly defined and the same points apply as for EDWA, with the difference that instead of being sent offsite to communal landfills or EWDAs, BPs can be sold.

The BA is the main driver for encouraging progressive rehabilitation (i.e. rehabilitation while the quarry is still active) of unused areas in the quarry. Water bodies that do not involve the intentional treatment of process wastewater can be considered as biodiverse if it is populated with aquatic species and/or vegetation has been established around its borders. Creative solutions to the planting of dense shrubs or trees could serve the double purpose of serving as wind-breaks and introducing biodiversity. The use of the land for growing crops, feeding farm animals or aquaculture can also be considered as biodiverse so long as the farming process would meet any requirements for organic farming practices. This does not strictly mean that the land or water area must be certified as organic for it to be considered as part of the BA, but simply that a description of the farming activity and a declaration of compliance with a number of requirements about organic practices on the quarry land be provided. Competent Bodies are also recommended to consider the recognition of biodiversity in significant <u>vertical areas</u>, if they are covered by naturally established climbing vegetation, deliberately planted green walls and/or natural or constructed nesting sites. Such areas would not show up so well in a satellite view and so would need to be highlighted in photographs – together with an explanation of where they occur in the satellite view.

The REA offers a significant potential use for quarries of different topographies. In flatter sites, the establishment of photovoltaic farms is of obvious potential and creates an indirect incentive to reduce dust emissions (because dust would reduce the efficiency of the panels). In more vertical sites, wind flows in



#### EU ECOLABEL USER MANUAL HARD COVERING PRODUCTS Commission Decision (EU) 2021/476 for the award of the EU Ecolabel for HARD COVERING PRODUCTS

certain areas offer potential for wind turbines and, due to the temperature differentials that can exist on the site, the potential for downdraft towers, updraft towers or solar chimneys is of interest, especially for the latter on south facing quarries. The area dedicated to renewable energy generation should be clearly delineated and, although unlikely, it could potentially overlap with the QF, EDWA or BPDA (e.g. PV panels covering these areas). In exceptional cases, the REA could overlap with the BA, for example in cases where reed beds are counted as BA but, if the reeds are harvested periodically for use as biomass fuel, it is also counted as REA. The criteria here are designed precisely to encourage the consideration of such synergies in land use planning by the quarry managers

- A satellite view of the quarry, with areas for TAA, QF, EWDA, BPDA, BA and REA clearly delineated and with written justifications for why each area is defined as it is.
- Estimates of the areas delineated for the different areas (using tools that are freely available in the public domain, for example "calcmaps" or similar).
- Fill out the Parts C & D excel file worksheet for criterion 2.6.



## Criterion 2.7 – Energy consumption at the transformation plant

#### (i) Interpretation of criterion:

The same interpretation applies for criterion 2.1, with the only difference being that the scope for criterion 2.1 applies to energy consumed at the quarry, while the scope for criterion 2.7 applies to energy consumed at the transformation plant.

- (Upon request) a copy of the fuel and electricity inventory for the relevant period where data was submitted, which also explains the scope of processes and operations covered by the inventory.
- Fill out the Parts C & D excel file worksheet for criterion 2.7, specifying the quantity of material processed, the saleable material obtained and the total fuel and electricity consumption during the same period.
- (Upon request) copies of meter readings, bills and invoices for electricity and fuel to justify the numbers entered.
- A written breakdown of the different fuel and electricity sources used (if relevant), and how the carbon factors were calculated and how the % renewables was estimated.
- A copy of the electricity supply contract or other written evidence that would justify any claims for onsite or near-site renewables.
- (If points are claimed) A copy of the carbon footprint certificate or EPD, stating that the method is in line with ISO 14067 or PEF.



## Criterion 2.8 – Water and wastewater management at the transformation plant

#### (i) Interpretation of criterion:

A description of how water is used in the transformation shall be provided to the Competent Body. This description shall cover, as a minimum, the following aspects:

- what processes actually consume water at the transformation plant
- how water is supplied to the transformation plant
- what happens to the process wastewater (how is it treated and recirculated)
- what happens to the wastewater sludge (how is it stored and where does it end up)

A visual description of the site should also be included. For example, a satellite photograph, with indications pasted on top about the locations and routing of any stormwater, process water and wastewater flows would be a useful basis for a description. Photos and technical drawings of any process wastewater treatment equipment should also be provided.

If the visual description also demonstrates how stormwater landing on impermeable areas is harvested or diverted to prevent it running across working areas and prevents the dust from working areas being conveyed into natural watercourses, then 5 points shall be awarded.

- A description of how process water and wastewater is supplied, collected, used, treated and disposed of onsite.
- Fill out the Parts C & D excel file worksheet for criterion 2.8.
- (If claiming points) a description of how rainwater is collected from impermeable areas and stored, to prevent or reduce surface flow of rainwater across working areas and into natural watercourses.



## Criterion 2.9 – Dust control at the transformation plant

#### (i) Interpretation of criterion:

The interpretation of criterion 2.9 is essentially the same as that of criterion 2.4, with the main difference being that criterion 2.9 refers to dust control the transformation plant, while criterion 2.4 refers to dust control at the quarry.

- A description of the site processes that generate dust emissions and the measures in place to reduce the emissions of dust from the transformation plant.
- (Upon request) copies of training material and the medical check program for employees.
- Fill out the Parts C & D excel file worksheet for criterion 2.9.



# Criterion 2.10 – Reuse of process waste from the transformation plant

#### (i) Interpretation of criterion:

The mandatory element of this criterion is to implement a plan to systematically monitor, record and achieve a minimum reuse of process waste. The monitoring and recording system should therefore amount to an inventory of process waste. There are two main types of process waste occurring from natural stone transformation plants, which should be recorded separately:

- Process scrap (i.e. fragments of stone of varying sizes)
- Process sludge (i.e. fine powder resulting from clarification of process wastewater or dust collection).

The destination of the process scrap and process sludge must also be recorded. The main destinations would be use onsite (e.g. in road base, geotechnical fill or construction of walls etc.) use offsite (sale as aggregate for various purposes, sale as a raw material for cement production or for other purposes) or disposal (landfill onsite or offsite). The applicant should keep records of shipments of process scrap and sludge offsite in case the Competent Body requests to see them.

Criterion 2.10 suffers from a similar issue to criterion 2.2, which refers to the potential mismatches in process waste production and reuse (e.g. reuse of historically stockpiled waste would lead to overestimated waste reuse and ongoing stockpiling of process waste would lead to low reuse rates). The solution to these issues is to extend the inventory period sufficiently so that a representative set of data is obtained. For example, if process waste reuse applications are highly intermittent (e.g. every 15 months), the inventory should extend for those 15 months. Alternatively, applicants should make efforts to have a more regular flow of process waste for reuse applications.

It is much easier to find reuse applications for the process scrap than the process sludge. For this reason, the data should be kept separate and a minimum requirement is placed on the reuse of process scrap (80%). Any reuse of process scrap above 80% is rewarded with points and any reuse of process sludge at all is rewarded with points.

The inventory should be kept in <u>consistent units of mass</u>. However, due to inaccuracies that can result in estimates of the volumes of waste (where it would be necessary to also assume a bulk packing density), it would be necessary to require a weighbridge or other means of recording the quantities of waste produced.

With process sludge, <u>data should ideally be reported in terms of dry solids</u> (i.e. dry solids produced, dry solids disposed of and dry solids reused). This would require both the weighing of the sludge and an assumption about the water content. Wet sludge masses can be used (i.e. wet sludge produced, wet sludge disposed of and wet sludge reused), but potential inaccuracies in the mass balance of wet process sludge are much larger due to the variations in moisture content (e.g. sun exposure, humidity and rainfall).

- An inventory of process scrap and process waste generation for a period of at least 12 months. This should also include the quantity of material processed during the same period and descriptions and locations of any destinations for reuse or disposal.
- Fill out the Parts C & D excel file worksheet for criterion 2.10.



(Upon request) Shipment notes of any scrap or sludge leaving site.



# Criterion 2.11 – Regionally integrated production at the transformation plant (optional)

#### (i) Interpretation of criterion:

This criterion is optional, but encourages the use of natural stone from quarries in the same region (within 260km travel distance).

For clarity, it should be understood that travel distance means the route travelled and not simply a straight line drawn on a map between the quarry gate and the transformation plant gate. The transport route should follow any applicable road or rail lines. If shipping routes apply, these may be less clear, but should be estimated based on actual routes anyway.

It is normal for transformation plants to receive natural stone blocks and slabs from a number of different quarries. This is so that a wider range of products can be offered to customers. Since each quarry will have a different transport distance to the transformation plant, this will create a distinction in the points that may apply to different products that can fall under the same EU Ecolabel license.

Transformed natural stone products coming from the same transformation plant, but using intermediate blocks/slabs from different quarries will require different entries (rows) in the criterion 2.11 excel input if they are to be covered by the EU Ecolabel license application. This will translate into separate entries (rows) in the "Summary" worksheet, not only due to the potential differences in points under criterion 2.11, but for all the other quarry specific criteria (2.1 to 2.6).

If blocks or slabs are not purchased directly from the quarry, but come via some intermediary, the travel distance from the quarry to the intermediary and then from the intermediary to the transformation plant, should be counted. Only if it is clear that the intermediary does not physically handle the natural stone blocks and slabs, could this extra transport be ignored.

Applicants should keep copies of delivery invoices that clearly state the source quarry or quarries, in case this information is requested by the Competent Body.

- A map indicating the locations of the transformation plant and the quarry or quarries where products covered by the EU Ecolabel application are sourced.
- Details of the transport route between the source quarries, including any changes in transport mode and following the actual routes for road, rail or ship.
- Fill out the Parts C & D excel file worksheet for criterion 2.11.
- (Upon request) Delivery invoices of any natural stone blocks and slabs from the quarries that are claimed to be within a 260km transport distance.



## Agglomerated stone product criteria

## Criterion 3.1 – Energy consumption

(i) Interpretation of criterion:

#### Specific energy consumption (10 points in total)

Applicants should keep records of process electricity consumption, ideally with dedicated meters that can separate consumption due to the process from the other uses (e.g. offices etc.). Simultaneously, records should be kept of the quantities of saleable products produced. These records should be made available to the Competent Body upon request.

The agglomerated stone production process is based on batch processes, normally using the BretonStone technology, that are powered exclusively by electricity. As each batch produces a very well defined volume of product (determined by the mould dimensions) and this volume can be converted to mass by multiplying by the specific density of the material, the production quantity should be defined in terms of volume and mass.

Depending on where electricity meters are located, the specific energy consumption of each batch run could potentially be recorded and the specific energy consumption (in kWh/kg) could be determined. This can be converted to MJ/kg simply by multiplying by 3.6. If electricity consumption is only measured at the factory level, applicants should be aware that non-invasive meters can be placed around cables powering equipment that would allow very specific consumption rates to be recorded.

It is up to the applicant to decide what level of detail to provide in the data. However, data that is averaged over a longer period can be considered as more representative. If there are significantly different specific energy consumptions (e.g. >15%) between products covered by the EU Ecolabel license, these should be reported separately. Up to 5 separate entries are possible in the Parts C & D excel spreadsheet and more entries can be manually added.

Electricity consumption for grinding of the raw material should also be included, even if it is necessary to obtain this information from suppliers. Although this consumption is NOT counted towards the total reported under criterion 3.1, its potential significance to overall energy consumption could be important.

#### Renewable energy (20 points in total)

For clarity, the first 10 points that are available refer to the <u>share of renewable electricity</u>. The next 10 points refer to <u>how renewable electricity is sourced</u>, regardless of how much of the total electricity is due to renewables. In cases where renewable electricity comes from more than one type of contracting (e.g. onsite generated via PV panels and a share of renewables in a green tariff from the utility supplier) the source that accounts for the largest share of renewable electricity shall be chosen.

#### How the interface looks in the Parts C & D excel worksheet

Since there are a number of cells that require entries for indicator 3.1 and that these impact on how many points are awarded, it is worth presenting how the cells appear in the Parts C & D excel worksheet.

It should be noted that the entry below can be as a single set of numbers for all products covered by the application or separate entries can be made for products with different specific electricity consumptions. The excel provides for 3 separate entries for criterion 3.1 and more could be copied and pasted in if needed.



A	В	С	D	E F	G	Н	
1	EU Ecolabel hard covering products						
2	Criterion 3.1. Energy consumption						
3	Reference name for data entry						
4	Key data from energy inventory	Data input	Units		Points		
5	Time period of data collection:					-	
6	Stone powder used:						
7	Curing process:						
8	Approximate density of agglomerated stone:	2400	kg/m3				
9	Quantity produced during data collection period:	416.67	m3				
10	Quantity produced during data collection period:	1000	tonnes				
11	Process electricity consumption during period:	214576	kWh				
12	Additional electricity consumption due to grinding of stone	0.03	kWh/kg				
13	Specific energy consumption (kWh/kg)	0.21	kWh/kg				
14	Specific energy consumption (MJ/kg)	0.77	MJ/kg				
15	LOOKUP value (MJ/kg)	0.77	MJ/kg		8.25	out of 10	
16	Percentage of electricity that is renewable	67	%		6.70	out of 10	
17	Type of renewable electricty used (if any)	Green tariff from utility supplier			4.00	out of 10	

The time period for the data collection should be supported by records of electricity consumption and production of saleable products, in case the Competent Body requests these records. The next green cell in the column (C6) is to decribe the main types of product or products covered by the data (the main two options will be granite or quartz, but possibly other varieties could apply). Then it is necessary to define the curing process (cell C7) and the specific density of the stone (cell C8). The density can be used to automatically convert volume (m3) to mass (tonnes) in the 2 cells below (C9 and C10). Depending on what unit the applicant first measures, it would make more sense to have C9 as an automatic output or cell C10. Alternatively, the applicant can manually enter both values.

The applicant then enters the total process electricity consumption (in kWh) and adds the additional electricity consumption due to stone grinding. The former value is used to calculate the specific electricity consumption. In the example above, the numbers come out at 0.21 kWh/kg. Multiplying this by 3.6 MJ/kg, the value comes out at 0.77 MJ/kg.

If the value should be >1.10 MJ/kg, the output would be highlighted in red and bold as it indicates that it fails some mandatory element of the criterion. If the value was somewhere between 0.70 and 1.10, this would result in the entry remaining black and some points being awarded in the first of the three points cells shown above. If the specific electricity consumption is less than 0.70 MJ/kg, the entry becomes "<0.70" and full points (10) are allocated. Specific energy consumption values between 0.70 and 1.10 MJ/kg will generate a total points output of between 0 and 10, rising proportionally as the value decreases towards 0.70.

The final two Column C cells in green require the applicant to define the percentage of electricity that is renewable and the main contracting mechanism for renewable electricity. The inputs here determine the points in cells G16 and G17. The applicant must be ready to share supporting information to justify any renewables claims and contracting mechanisms.

- Fill out the Parts C & D excel file worksheet for criterion 3.1.
- Information about the electricity consumption for stone grinding (from supplier if necessary)
- 🗎 (Upon request) Records of electricity consumption and production of saleable products.



A copy of the electricity supply contract and other written evidence that would justify any claims for onsite or near-site renewables.



## Criterion 3.2 — Dust control and air quality

#### (i) Interpretation of criterion:

A description of the main sources of styrene and dust emissions needs to be provided, together with details about operational site measures in place to reduce exposures. This description must include details of the closed dosing and mixing systems for resins and the first five points listed in criterion 3.2.

When the description makes reference to training about good practice for dust control, a copy of this material should be provided to the Competent Body upon request (the 5<sup>th</sup> point on the list).

Finally, details of the medical check-up program for employees should also be explained.

- A description of the site processes that generate styrene emissions and dust emissions and the measures in place to reduce the emissions of dust from the factory.
- Fill out the Parts C & D excel file worksheet for criterion 3.2.



## Criterion 3.3 — Recycled / secondary material content

#### (i) Interpretation of criterion:

Before considering the potential environmental benefits of recycled or secondary materials, it is necessary to make sure that they are not sourced from much further away than the virgin raw materials used. As a very general rule of thumb, if the transport distance is more than 2.5 times that of the virgin raw material, the environmental benefits of the recycled or secondary material can be largely cancelled out by the extra impacts due to longer transport.

Consequently, the first information that the applicant needs to provide is a list of all the raw materials and recycled or secondary materials used, and how far these sources are from the factory. Information about the locations of raw materials used should already be available due to the requirements of criterion 1.1. For clarity, the focus of this information should be on the inorganic raw materials used and not on the resins or other chemicals used in the process.

In cases where materials are supplied by an intermediary, any transport from the source to the intermediary shall be counted in addition to transport from the intermediary to the agglomerated stone producer. Upon request, contact details of suppliers should be provided to the Competent Body.

In terms of counting recycled materials, any reuse of process waste from the factory shall not be credited as recycled material if it is going back into the same production process that generated it.

#### How the interface looks in the Parts C & D excel worksheet

Since there are a number of cells that require entries for indicator 3.3, it is worth presenting how the cells appear in the Parts C & D excel worksheet.

	АВ	C	D	E	F	G
33	Criterion 3.3. Recycled / secondary material co	ontent				
	Have the approximate transport distances of all raw materi	als, secondary materials and				
34	recycled materials used in the process been provided?					
35	Material source(s)	Transport distance	Units	]		Points
36			km	1		
37			km	1		
38			km	1		
39			km	]		
40			km	1		
41			km	]		
42	Reference name for data entry	Recycled content				
43		13	%	]		13.00
44			%	1		
45			%	1		
46			%	1		
47			%	]		
48			%			
	Demole d (see an demonster de l'automatemo	(manual)	Outgoing	Balance		
49	Recycled/secondary material inventory	incoming (tonnes)	(tonnes)	(tonnes)		
50	e.g. January 20XX			0		Recycled/
51	e.g. February 20XX			0		secondary
52	e.g. March 20XX			0		material
53	e.g. April 20XX			0		inventory
54	e.g. May 20XX			0		result
55	e.g. June 20XX			0		Pass
56	e.g. July 20XX			0		
57	e.g. August 20XX			0		
58	e.g. September 20XX			0		
59	e.g. October 20XX			0		
60	e.g. November 20XX			0		
61	e.g. December 20XX			0		



The first input cell (D34) is a confirmation that the sources and approximate transport distances for the main raw materials, secondary materials and recycled materials has been included. Rows 36 to 41 refer to inputs for the materials. If more than 6 materials are relevant, extra rows should be inserted.

In rows 43 to 48, the specific recycled/secondary material contents for different products covered by the EU Ecolabel application should be provided. Again, if more than 6 different product entries apply, extra rows should be inserted. In these rows, the % recycled content to the nearest 0.5% should be selected from the drop-down lists.

The final group of cells refer to an inventory of recycled/secondary material content. In these cases, the factory is treated like a black box with inputs and outputs of recycled and/or secondary materials. Inputs are related to deliveries and outputs are related to products or waste leaving the factory. It is up to the applicant to correctly allocate the flows of recycled / secondary material content to the different products and wastes leaving the factory. Inputs and outputs have to balance over any defined period of time and the balance (the quantity of recycled/secondary materials in the factory) must never fall below zero for any month.

Practically speaking, the only way the applicant can keep track of recycled/secondary material flows is to develop a system of credits/debits that is recorded on any delivered material invoices (credits), product shipment invoices (debits) and waste shipment notes (debits). Because the agglomerated stone production process is of the batch-type, it should be relatively straight-forward to correctly allocate flows of recycled/secondary materials into real products.

- Fill out the Parts C & D excel file worksheet for criterion 3.3.
- (Upon request) contact details of secondary or recycled material suppliers.
- 🖹 (Upon request) a copy of the records kept for tracking flows of recycled and secondary materials.



## Criterion 3.4 — Resin binder content

#### (i) Interpretation of criterion:

The resin binder content is a key technical parameter for optimising the mixing and curing process. Consequently, this content should be very well known. It may be that the resin content is very similar for all products covered by the license, or that it may vary significantly between different products. In the latter case, multiple entries can be made.

The binder content ultimately comes down to a self-declaration by the applicant that could potentially be assessed in real products by selective sampling and testing.

#### Required documentation for Assessment and verification:

Fill out the Parts C & D excel file worksheet for criterion 3.4.



## Criterion 3.5 — Reuse of process waste

#### (i) Interpretation of criterion:

The mandatory element of this criterion is to implement a plan to systematically monitor, record and to achieve a process waste reuse rate of at least 70%.

Due to the problems of potentially misleading reuse rates caused by irregular or sporadic reuse applications of process waste (e.g. process waste building up over a long period of time and then being reused on a large scale very quickly) it is necessary to monitor data over a period of at least 12 months. If longer periods are needed to demonstrate the full picture, the data could be collected over a longer time.

The monitoring and recording system should amount to an inventory of process waste and production of saleable products. Although the criterion actually states production in units of m2, due the different thicknesses of slabs and cuts that are possible, it may be more appropriate to simply report production in terms of mass and volume, rather than surface area. The excel worksheet for criterion 3.5 awards points based on the data in mass.

The destination of the process waste must also be recorded. The main destinations would be use onsite (e.g. in road base, geotechnical fill or construction of walls etc.) use offsite (sale as aggregate for various purposes, sale as a raw material for cement production or for other purposes) or disposal (landfill onsite or offsite). The applicant should keep records of shipments of process waste offsite in case the Competent Body requests to see them.

The inventory should be kept in consistent units of mass, due to inaccuracies that can result in estimates of the volumes of waste (where it is necessary to also assume a bulk packing density). This would require a weighbridge or a similar means of recording the quantities of waste produced.

#### How the interface looks in the Parts C & D excel worksheet

Since there are a number of cells that require entries for criterion 3.5, it is worth presenting how the cells appear in the Parts C & D excel worksheet.

A	В	C	D	E	F	G	Н
73							
74	Criterion 3.5. Reuse of process waste						
75	Key data from process waste inventory	Data input	Units		Check	Points	
76	Reference name for data entry	Product X					
77	Time period of data collection:	Jan - Dec 2020					
78	Approximate density of waste:	2450	kg/m3				
79	Incoming material processed during this time period:	395	m3				
80	Of which has been sold or is ready for sale:	224	m3				
81	Of which has become process waste	163	m3				
82	Quantity of process waste reused during same period:	5	m3				
83	Incoming material processed during this time period:	967	tonnes				
84	Of which has been sold or is ready for sale:	550	tonnes				
85	Of which has become process waste	400	tonnes				
86	Quantity of process waste disposed to landfill:	13			-17	tonnes	
87	Quantity of process waste reused during same period:	387	tonnes		98.2	% of ingoing	g material
88	Fraction of process waste reused	97	%			9.00	

The first two green cells (C76 and C77) require some details about the product reference and the time period for data collection. The latter should be at least 12 months prior to the awarding of the EU Ecolabel. It is possible that in factories which produce both quartz and marble products, that the reuse options for the



quartz and marble waste are significantly different and that the applicant wishes to report these differences in separate entries. In such cases, the same cells appear again in columns further to the right (beyond Column H).

The green cells near the bottom (C83 to C86) are for the weights of materials going into the process, the saleable product mass coming out of the process, the process waste and the process waste reuse. Each of these masses can be converted into a volume as well by using the optionally defined stone density in cell C78.

As a check that the quantities are suitable, there is a check cell that indicates if there is any discrepancy in the balance of:

materials in = saleable products out + waste out.

If the waste is underestimated, the value for waste should be increased, since it could be due to fugitive emissions of dust, incorrect assumptions about moisture contents and/or waste not being properly recorded.

Quantities of waste transported to storage areas onsite, to disposal sites or to reuse applications should be recorded. These quantities should be recorded at the plant, ideally via a weighbridge, and any waste leaving the site (for disposal or for reuse) should be logged. Shipment notes for waste leaving site should be kept by the applicant in case the Competent Body requests this information.

If the process waste reuse rate is <70%, this would flag up in red, bold text, indicating that a fundamental requirement for the criterion is not being met.

#### Required documentation for Assessment and verification:

Fill out the Parts C & D excel file worksheet for criterion 3.5.

(Upon request) a copy of the waste inventory, together with any invoices and waste shipment notes.



## Ceramic and fired clay product criteria

## Criterion 4.1 – Fuel consumption for drying and firing

#### (i) Interpretation of criterion:

#### Fuel consumption for drying and firing (20 points in total)

The mandatory elements of this criterion relate to the non-use of certain fuels (coal, petroleum coke, light fuel oil and heavy fuel oil) and place an upper limit of specific fuel consumption (in units of MJ/kg) for whatever other fuels are actually used.

Separate limits are defined for:

- spray dryers
- ware dryers and kiln

The **separate limit for spray dryers** is because in many cases the spray drying operation is completely independent of the ware drying and the ceramic kiln. Even in sites where spray drying also takes place, the scale of spray drying will tend to be large enough to produce excess spray dried powder for sale to other sites. Consequently, in many cases a specific energy consumption for spray drying will need to come from a third party. The underlying information needed to support any declarations of specific fuel consumption during a defined period will be:

- quantity of spray dried powder produced (in kg, including the assumed moisture content of 5-7%)
- quantity of fuel or fuels consumed (in kg, m3 or other relevant unit)
- the specific calorific value of the fuel or fuels consumed (in MJ/kg, MJ/m3 or MJ/other relevant unit)

Unlike spray drying, the applicant will always be generating this <u>data for ware dryers and kilns</u> at their sites. The energy consumption for the ware dryer and kiln is grouped together because these units run in sequence at the same site and waste heat from the kiln will be partially reused in the ware dryer. To account for the different configurations possible and to recognise the environmental benefits of those setups that make the optimum reuse of waste heat from the kiln. If separate, dedicated burners are also used for the ware dryers, even though they will be much smaller than the burners used in the kiln, any fuel consumption in the ware dryer burners should be counted as well.

Fuel consumption data can be reported at different scales of production, depending on the level of detail at which data is available. If fuel consumption rates at the level of individual burners can be collected, it is possible to report data at a **very high level of granularity for individual products**. This would be especially relevant in cases where the specific fuel consumption varies significantly between different products produced at the site – for example, due to different raw material compositions, different firing temperature profiles and different product characteristics needed.

If the products covered by the license have very similar specific fuel consumption rates, it is possible to submit data at a **lower level of granularity**, perhaps including several kilns in aggregated data. Regardless of the level of data reported, the same basic information is required as stated above for spray dried powder:

- quantity of tile or paver produced (in kg, optionally m2 can also be defined)
- quantity of fuel or fuels consumed (in kg, m3 or other relevant unit)

- the specific calorific value of the fuel or fuels consumed (in MJ/kg, MJ/m3 or MJ/other relevant unit)

For ceramic tiles, there is an important difference depending on whether the data collection period refers to <u>individual products</u> (i.e. data collected over a shorter, representative period of stable operation) or a <u>family of</u> <u>products</u> (data collected over a much longer period of continuous production).

Higher limits of fuel consumption apply for the longer periods of continuous production since these will also include periods of low production and standby, when production rates are reduced or stopped but when the kiln is not fully shut-down.

#### How the interface looks in the Parts C & D excel worksheet

Since there are a number of cells that require entries for criterion 4.1, it is worth presenting how the cells appear in the Parts C & D excel worksheet.

	Α	В	C	D	E	F	G	H I			
1	EU Ecolabel hard covering products - ceramics										
2		Criterion 4.1. Fuel consumption for drying and	d firing								
3	1	Reference name for data entry									
4	1	Key data from energy inventory	Data input	Units		Limit	Points				
5		Has coal, petroleum coke, light fuel oil or heavy fuel oil been used in the dryers or kilns that produce the products covered by the application?	No								
6		Type of product covered	Ceramic tile - individual product	1							
7		Is spray-dried powder used?	Yes	I			_				
8		If yes, is spray-dried powder produced by applicant?	No, by third party			1.8	MJ/kg uppe	er limit			
9		Specific spray-dried powder energy consumption (SDP):	1.376	MJ/kg		1.3	MJ/kg exce	llence limit			
10		SDP lookup value and points:	1.38	MJ/kg			16.80				
11		Time period of data collection for kiln and ware dryer:									
12		Quantity produced during data collection period:		m2							
13		Quantity produced during data collection period:	1000	kg product			_				
14		Process fuel consumption during data collection period:	3491	MJ		4.1	MJ/kg uppe	er limit			
15		Specific kiln & ware dryer fuel consumption (KWD):	3.49	MJ/kg		3.2	MJ/kg exce	llence limit			
16		KWD lookup value and points:	3.49	MJ/kg			13.56				
17		Overall score for criterion 4.1:					14.69				
10											

The inputs for the excel that are required start with a reference name for the data entry (cell C3) and a confirmation that the prohibited fuels have not been used (cell C5). The next input (cell C6) is related to how many products the data covers and whether it is continuous data (family of products) or more specific data (individual products). The input in cell C6 will affect the limits that automatically appear in cells F14 and F15, which in turn affect the outputs of the points awarded.

The next inputs in cells C7 and C8 determine if the score will take into acocunt data for spray dried powder production or not. A declaration on the value (in MJ/kg) is required, and if the applicant is also the spray dried powder producer, or if the values seem unusually low, the competent body may request the underlying data behind the calculation for the value in cell C9.

Regarding the ware dryer and kiln, the applicant should define the period over which the data has been collected (this should be 12 months for continuous production data relating to families of products but can be much less for individual products). The total quantity of relevant products produced the same period (only those products associated with the fuel consumption that is being reported) needs to be inserted in kg in cell C13 and can optionally be defined in m2 in cell C12. The applicant needs to define the fuel energy consumed during this time period for the relevant products (fuel quantity consumed multiplied by calorific value of the fuel).



The points are automatically calculated in cell G10 for the spray dried powderand in cell G16 for the ware dryer and kiln. The overall score in G17 should be the same as G16 in cases where spray dried powder is not used and it will be a composite of both G10 and G16 in cases where it is used.

- If spray dried powder is from a third party, a declaration about the specific fuel consumption.
- Fill out the Parts C & D excel file worksheet for criterion 4.1.
- (Upon request) details of the calculation for fuel consumption (MJ) and specific fuel consumption (MJ/kg).



## Criterion 4.2 – CO2 emissions

#### (i) Interpretation of criterion:

#### Mandatory requirements and scope

The mandatory elements of this criterion relate to upper limits on the specific CO2 emissions associated with the production process. The scope of CO2 emissions matches the same fuel consumption as defined in criterion 4.1 (i.e. for fuels combusted in any spray dryers and for ware dryers and kilns). It does not include any CO2 emissions associated with the consumption of electricity but it does include process emissions from the decarbonation of carbonates in raw materials.

Where the installation is situated in an EU Member State and has a production capacity >75tonnes/d), it is required to report under the Emissions Trading Scheme. The emissions counted under criterion 4.2 match up well with the requirements for ETS reporting. The major difference is that ETS reporting applies to the level of the whole factory, whereas the EU Ecolabel data can apply to individual products or a whole family of products. A factory can potentially produce more than one "family of products" and the production might shift in time from one type of products to another and to more customised products or more standardised products, depending on market demands. So in cases where production is variable, the applicant should clearly explain what parts of their production are associated with the EU Ecolabel and which are not.

#### **Process emissions**

The carbonate content is the main determining factor about possible process CO2 emissions. The firing temperatures involved in ceramic kilns are sufficiently high (>800 °C) to result in the thermal decomposition of mineral carbonates from CaCO3 or MgCO3 to CaO or MgO + CO2. However, the extent of decarbonation will be unlikely to approximate to 100%. On the other hand, any organic carbon present in the raw material, either deliberately added or as impurities, will also result in process CO2 emissions that is much more likely to approximate to 100%.

To avoid unnecessary confusion, the rules for estimating process emissions for the EU Ecolabel should simply follow those of the Emissions Trading Scheme and applicants should make reference to the relevant calculation methods for decarbonation when making the EU Ecolabel application. Criterion 4.2 makes specific reference to Regulation (EU) 2019/331 and Regulation (EU) 601/2012. It should be noted the latter has now been repealed by Regulation (EU) 2018/2066.

#### How the interface looks in the Parts C & D excel worksheet

Since there are a number of cells that require entries for criterion 4.2, it is worth presenting how the cells appear in the Parts C & D excel worksheet.



4 1	P	C.	D	F	F	G H I	
P	B	• • •			F	ОПІ	-
1	EU Ecolabel ha	ard covering produ	cts - ce	erami	CS		
20	Criterion 4.2. CO2 emissions						
21	Reference name for data entry						
22	Key data from energy inventory	Data input	Units		Limit	Points	
23	Type of product covered	Ceramic tile - individual product					
24	Is spray-dried powder used?	Yes					
25	If yes, is spray-dried powder produced by applicant?	Yes			84	kgCO2/t upper limit	
26	Specific spray-dried powder energy consumption (SDP):	59	kgCO2/t		54	kgCO2/t excellence limit	t
27	SDP lookup value and points:	59	kgCO2/t			20.83	
28	Time period of data collection for kiln and ware dryer:						
29	Quantity produced during data collection period:		m2				
30	Quantity produced during data collection period:	1000	kg product				
31	Process CO2 emissions	45	kgCO2/t				
32	Fuel CO2 emission during data collection period:	213	kgCO2		280	kgCO2/t upper limit	
33	Specific kiln & ware dryer fuel CO2 emission (KWD):	258	kgCO2/t		230	kgCO2/t excellence limit	t
34	KWD fuel lookup value and points:	258	kgCO2/t			11.00	
35	Overall score for criterion 4.2:					14.44	

A total of 9 inputs are required (green cells). The first, in cell C21, is simply a reference name for the data entry. The next input in cell C23 is about the granularity of the data being reported – this is indirectly linked to the data collection period defined later in cell C28, where data for individual products can be taken over shorter, representative periods and data for families of products should be taken over a period of 12 months. The input in cell C23 also has a direct effect on the applicable limits in cells F32 and F33, in a similar manner as for criterion 4.1 (i.e. the upper and lower limits vary depending on the product type selected and the points awarded depend on where the results lie relative to this range).

A specific input is required for CO2 emissions associated with spray dried powder – whether this needs to come from a supplier or whether the spray drying operation is carried out in-house. For the avoidance of doubt, when talking about the kgCO2/t in cell C26, the "t" refers to tonne of spray dried powder. Process emissions during spray drying are expected to be insignificant regarding mineral decarbonation, but could potentially affect the combustion of organic matter.

Moving on to the data for the ware dryer and kiln, the quantity of production needs to be defined in kg in cell C30 (and optionally in m2 in cell C29). The estimated process CO2 emissions (based on carbonate and organic content in raw material) should be entered in cell C31 in units of kgCO2/t and the fuel CO2 emission should be entered in cell C32 (in kg CO2). If the process emissions are zero, then "0" should be entered into cell C31. If the data collection period and scope for reporting on CO2 in criterion 4.2 matches that used in criterion 4.1, the C26 and C32 values can be directly calculated from the equivalent data for criterion 4.1, simply by multiplying by a carbon emission factor for the fuel used.

The inputs in C31 and C32 automatically generate the outputs in cells C33 and C34, with the latter determining the points applicable in cell G34. As with criterion 4.1, if sprayed dried powder is used, the overall score in cell G35 is a composite of the points in cells G27 and G34, if not, it is simply the same as cell G34.

- If spray dried powder is from a third party, a declaration about the specific CO2 emissions.
- Fill out the Parts C & D excel file worksheet for criterion 4.2.
- (Upon request) details of the calculation for specific CO2 emissions (process and fuel combustion).



## Criterion 4.3 – Process water consumption

#### (i) Interpretation of criterion:

This criterion will normally be applied at the level of the factory since it may be complicated to allocate different specific water consumptions to different products in cases where the ingoing materials may be dry-milled, wet-milled or spray dried and where process wastewaters from different production lines are combined and recirculated.

For this reason, in cases where the factory has already maximised the potential for wastewater reuse, there is no requirement on specific water consumption and in cases where specific water consumption needs to be defined, the applicant has flexibility in deciding at what level the calculation should be applied at.

The Parts C & D excel sheet has a relatively simple set of input fields that result in a "Pass" or "Fail" output for criterion 4.3 that is also linked to the "Summary" worksheet.

- Fill out the Parts C & D excel file worksheet for criterion 4.3.
- (Upon request) details of the zero liquid discharge system or the specific freshwater consumption calculation. In the case of the latter, it should be declared at what level the estimation was made (e.g. at individual product level, at production line level or at factory level).



## Criterion 4.4 – Emissions of dust, HF, NOx and SOx to air

#### (i) Interpretation of criterion:

#### Mandatory elements

A mandatory limit is set for specific dust emissions from spray dryers (90 mg/kg) and upper limits are set for specific emissions of dust, HF, NOx and SOx from the kiln.

#### Scope of data

As with criteria 4.1 and 4.2, if the spray dried powder is produced by a third party, a declaration from the supplier will be required. Depending on the complexity of the production set-up at the site where the EU Ecolabel products are produced, and the share of total products from that site that will form part of the EU Ecolabel application, the representativeness of the emission data may vary if it is simply allocated on a per mass of production basis for the whole output. The main factors that would influence the representativeness of centralised data are:

- the share of total production at the site that is covered by the EU Ecolabel application

- the variability of raw material compositions in different products (especially in fluorine and sulphur)

- the variability of different firing schedules for different products (time and temperature profiles)

As the share covered by the EU Ecolabel decreases and the variabilities increase, the representativeness of centralised data for the EU Ecolabel decreases. The applicant should explain these aspects to the competent body and it can be discussed if there is a need for more specific data collection or for different assumptions to apply to the allocation method than simply allocating by mass of production.

#### Frequency of data monitoring

Regarding emissions from the kilns, which will always be under the control of the applicant, any installation with a capacity >75 tonnes/d will be subject to reporting requirements of the Industrial Emissions Directive (IED) 2010/75/EU. Although harmonised emission reporting for ceramic production installations has not yet been finalised, this will come in the next few years, while the EU Ecolabel criteria for Hard Covering Products is still valid. As of 2021, different requirements on reporting on emissions can apply in different Member States.

The most obvious difference is the need to continually monitor SOx emissions in some installations and not at all in others. For the EU Ecolabel, where continuous data is already collected, this should be used for the calculations. Where no data is collected, at least 3 sets of periodic monitoring data is required for each 12 month period. The periodic data must be collected during stable operation conditions of the plant and results be normalised to the same standard conditions as required for continuous monitoring (i.e. 18% O2 content, 273K and 101,3 kPa.

#### Units for data reporting

Another important difference is that the IED sets limits in terms of exhaust gas concentration (i.e. mg/Nm3), whereas the EU Ecolabel sets limits based on production (i.e. mg/kg product). The key bridge between these two approaches is the <u>specific airflow rate</u>, which should be estimated in Nm3/kg of product.

#### How the interface looks in the Parts C & D excel worksheet

Since there are a number of cells that require entries for criterion 4.4, it is worth presenting how the cells appear in the Parts C & D excel worksheet.



4	А	В	С	D	E	F	G
1		EU Ecolabel ha	ard covering produc	ts - ce	rami	cs	
48		Criterion 4.4. Emission of dust, HF, NOx and S	Ox to air		-		
49		Reference name for data entry					
50		Spray dryer dust emissions					
51		Is spray drying carried out onsite?	Yes		Check	Limit	
52		Data collection period:				90	małka
53		Spray dried powder produced during period:	100000	kg	1		
54		Weighted average dust emission conc. during peri	5	mg/Nm3	1		Result
55		Total airflow rate during period:	400000	Nm3	4.00	Nm3/kg	Pass
56		Specific spray dryer dust emissions:	20.00	mg/kg			
57		Kiln dust emissions			-		
58		Reference name for data entry					
59		Data collection period:			,		
50		Relevant tile/paver production during period:		m2			
51		Relevant tilepaver production during period:	1000	kg	Check	Limit	Points
52		Weighted average dust emission conc. during peri	6	mg/Nm3		50	mg/kg
53		Total airflow rate during period:	4000	Nm3	4.00	Nm3/kg	
54		Specific kiln dust emissions:	24	mg/kg			Points
65		Specific kiln dust emissions lookup value:	24	mg/kg			6.5
56		Kiln HF emissions					
57		Reference name for data entry	<b>`</b>				
58		Data collection period:			1		
53		Relevant tilepaver production during period:	1000	mz	ch - L		D
70		Relevant tile paver production during period:	1000	kg	Check	Limit	Points
71		Weighted average HF emission conc. during period	3.3	mg/Nm3	4.00	20	mg/kg
12		o contra arritow rate during period:	4000	INM3	4.00	INMarkg	a : .
73			13	mgrkg "	-		Points
74		Specific kiln HF emissions lookup value:	13	mg/kg	J		5.00
75		Kiin NOX emissions					
75		Data collection period:	<b>_</b>				
78		Belevant tilebayer production during period:		m2	1		
70		Relevant tildpaver production during period:	1000	ka.	Chack	Limit	Dointe
20		Weighted average NOx ergination carried during period.	45	ng malNm2	CHECK	250	Points
31		Total airflow rate during period:	3400	Nm3	3.40	200 Nm3ka	ngkg
22		Specific kilo NOV emissions:	153	maka	0.40	nanang	Dointe
22		Specific kills NOx emissions.	/170	marka	{		10.00
20		Kiln SOx emissions	<#O	тнуку	]		10.00
35		Reference name for data entru					
36		Data collection period:					
37		Relevant tilebayer production during period:		m2	1		
38		Belevant tilebayer production during period:	1000	ka	Check	Limit	Points
39		Weighted average SOx emission conc. during perio	150	ma/Nm3	Circon	1300	małka
30		Total airflow rate during period:	4000	Nm3	4.00	Nm3/ka	
91		Specific kiln SOx emissions:	600	małka			Points
32		Specific kiln SOx emissions lookup value:	<750	małka	1		10.00

The first entries refer to spray dryer data (rows 49 to 56). The spray dryer inputs (cells C51 to C55) should be provided by the supplier in cases where spray dried powder comes from a third party. It is up to the applicant to define any meaningful reference name for the entry in row 49. The main output in cell C56 is a simple calculation of the data in cells C53, C54 and C55. As a check that the data is normal, the specific airflow rate is automatically generated in cell E55 and the embedded comment in cell E55 mentions a typical range for specific airflow rates. Since the requirement on dust emissions from spray drying is not associated with any points, a simple "Pass/Fail" output is generated in cell G55 and carried over to the "Summary" worksheet.

A very similar approach applies for emissions from the kiln, with the additional tional definition of production in terms of m2 and the additional output of points (in propotion to where the results in cells C65, C74, C83 and



C92 lie in relation to the ranges defined in criterion 4.4). All outputs relating to points are carried over to the "Summary" worksheet.

- If spray dried powder is from a third party, a declaration about the specific dust emissions, with the basic underlying data required for the calculation.
- A written explanation of how representative the emission data collected from the installation is of those emissions associated with the EU Ecolabel products covered by the application (this could inform further discussions with the competent body about optimum data collection and allocation approaches).
- Fill out the Parts C & D excel file worksheet for criterion 4.4.



### Criterion 4.5 – Wastewater management

#### (i) Interpretation of criterion:

This criterion can only be applied at the level of the factory, since wastewater treatment is a common system for the whole installation.

Full compliance is accepted in cases where a zero liquid discharge system is in place (option 1). The other 2 options result in wastewater being treated and discharged to local watercourses (options 2 and 3). In these latter two cases, a declaration is needed about the concentrations of suspended solids, cadmium and lead in the treated effluent.

The possibility of accepting analysis based on different test methods should be considered whenever the operating permit for the wastewater treatment plant also permits this.

While data should be weekly (or more frequent), it is possibly that testing for cadmium and lead is less frequent and, only if this is acceptable according to the operating permit, less frequent testing should be allowed. In the absence of ANY defined testing frequency for cadmium and lead, a minimum testing frequency of once per year, on a composite sample that is representative of at least 6 different samples, taken throughout a period of 6 months (one per month ideally) should be considered as acceptable.

As an alternative to testing for cadmium and lead in the effluent of a third party operated wastewater plant, and to avoid the potentially perverse situation of non-compliance due to inputs of cadmium and lead into the third party operated plant from other sources, the applicant can test their own effluent leaving their site for suspended solids, lead and cadmium and, if they already meet the limits, no declaration from the wastewater treatment plant would be necessary.

#### Required documentation for Assessment and verification:

Fill out the Parts C & D excel file worksheet for criterion 4.5.

If relevant, a declaration from the wastewater treatment system owner or operator about the suspended solids, cadmium and lead concentrations in treated effluent, supported by test reports upon request.



## Criterion 4.6 — Reuse of process waste

#### (i) Interpretation of criterion:

The mandatory element of this criterion is to implement a plan to systematically monitor, record and to achieve a process waste reuse rate of at least 90%.

Due to the problems of potentially misleading reuse rates caused by irregular or sporadic reuse applications of process waste (e.g. process waste building up over a long period of time and then being reused on a large scale very quickly) it is necessary to monitor data over a period of at least 12 months. If longer periods are needed to demonstrate the full picture, the data could be collected over a longer time.

The monitoring and recording system should amount to an inventory of process waste and production of saleable products. Although the criterion actually states production in units of m2, due the different thicknesses of slabs and cuts that are possible, it may be more appropriate to simply report production in terms of mass and volume, rather than surface area. The excel worksheet for criterion 3.5 awards points based on the data in mass.

The destination of the process waste must also be recorded. The main destinations would be use onsite (e.g. fed back into the raw material) or offsite (e.g. use in road base or as geotechnical fill etc.) or disposal (landfill onsite or offsite). The applicant should keep records of shipments of process waste offsite in case the Competent Body requests to see them.

The inventory should be kept in consistent units of mass, due to inaccuracies that can result in estimates of the volumes of waste (where it is necessary to also assume a bulk packing density). This would require a weighbridge or a similar means of recording the quantities of waste produced.

#### How the interface looks in the Parts C & D excel worksheet

Since there are a number of cells that require entries for criterion 4.6, it is worth presenting how the cells appear in the Parts C & D excel worksheet.

	Α	В	С	D	E	F	G	Н	1			
1	EU Ecolabel hard covering products - ceramics											
105		Criterion 4.6. Reuse of process waste										
106		Key data from process waste inventory	Data input	Units		Check	Points		_			
107	1	Time period of data collection:						-				
108	1	Approximate density of waste:	1800	kg/m3								
109		Incoming material processed during this time perio	537	m3								
110		Of which has been sold or is ready for sale:	306	m3								
111	1	Of which has become process waste	222	m3								
112		Quantity of process waste reused during same peri	215	m3								
113	1	Fraction of process waste reused	97	%								
114	1	Incoming material processed during this time perio	967	tonnes								
115	1	Of which has been sold or is ready for sale:	550	tonnes								
116		Of which has become process waste	400	tonnes								
117		Quantity of process waste disposed to landfill:	13	tonnes		-17	tonnes					
118		Quantity of process waste reused during same peri	387	tonnes		98.2	% of ing	joing ma	aterial			
119		Fraction of process waste reused	96.8	%			6.80					
120	1							_				

The first two green cells (C107 and C108) require some details about the time period for data collection and the approximate density of waste. The former should be at least 12 months prior to the awarding of the EU Ecolabel.



The approximate density of waste is simply used to allow for conversion of waste data in tonnes to m3. However, if data is consistently reported in tonnes, thanks to the use of weighbridges, then reporting as m3 should be purely optional.

The green cells near the bottom (C114 to C117) are for the masses of materials going into the process, the saleable product mass coming out of the process, the process waste and the process waste disposed of. The difference between total process waste produced and total process waste disposed of is assumed to be the process reused. Although this is arguably not the ideal approach, applicants can opt to overwrite the automatic estimation reuse in cell C118, if they do in fact monitor and measure this directly.

As a check that the quantities are suitable, there is a check cell that indicates if there is any discrepancy in the balance of:

materials in = saleable products out + waste out.

If the waste is underestimated, the value for waste should be increased, since it could be due to fugitive emissions of dust, incorrect assumptions about moisture contents and/or waste not being properly recorded.

Quantities of waste transported to storage areas onsite, to disposal sites or to reuse applications should be recorded. These quantities should be recorded at the plant, ideally via a weighbridge, and any waste leaving the site (for disposal or for reuse) should be logged. Shipment notes for waste leaving site should be kept by the applicant in case the Competent Body requests this information.

If the process waste reuse rate is <90%, this would flag up in red, bold text, indicating that a fundamental requirement for the criterion is not being met.

#### Required documentation for Assessment and verification:

Fill out the Parts C & D excel file worksheet for criterion 4.6.

(Upon request) a copy of the waste inventory, together with any invoices and waste shipment notes.



## Criterion 4.7 — Glazes and inks

## $\textcircled{\begin{tabular}{ll} \begin{tabular}{ll} \hline \hline \\ \hline \end{array}$ Interpretation of criterion:

Compliance with criterion 4.7 depends first of all on the declaration of the applicant about which glazes and inks are used (if any) and then the suppliers of relevant glazes or inks need to confirm that they do not contain any lead or cadmium in concentrations exceeding 0.10% as the metal.

Now that the requirement on the non-presence of SVHCs (i.e. <0.10% according to REACH communication requirements) has been extended from the final product to ingoing chemicals, the added value of criterion 4.7 is very limited since most or all relevant lead or cadmium compounds would be directly restricted via criterion 1.2.

#### Required documentation for Assessment and verification:

lf relevant, declaration(s) from the glaze or ink supplier(s).

Fill out the Parts C & D excel file worksheet for criterion 4.7.



## Precast concrete products or compressed earth blocks based on hydraulic binders or alternative cements

## Criterion 5.1 – Clinker factor

#### (i) Interpretation of criterion:

#### Applicability

This criterion <u>does not apply to hydraulic lime binders</u>. They do not "lose" points here, it is simply not counted as a possible contribution to the total points, and so the relevant threshold is lowered accordingly for hydraulic lime. It is also worth noting that while criterion 5.1 <u>does apply to alternative cements</u>, regardless of whether the clinker content is greater than or less than 30%, it would much more difficult to obtain the EU Ecolabel for alternative cements with higher clinker contents as they would effectively score zero points for criterion 5.1.

#### Information received

In cases where the applicant is actually the producer of the cement, the exact clinker factor would be communicated to the competent body. In cases where the applicant is a precast concrete producer and the cement producer does not want to communicate the exact clinker factor to their customer then, at least in the case of EN 197-1 Portland cements, the clinker factor can be estimated as per the assumptions indicated in criterion 5.1.

In the latter case, the precast producer would provide an example of the cement packaging or the delivery invoice where the EN 197-1 notation is stated.

- If the cement supplier does not want to declare the exact clinker factor: the EN 197-1 notation for the cement or cements used.
- Fill out the Parts C & D excel file worksheet for criterion 5.1.



## Criterion 5.2 – CO2 emissions

#### (i) Interpretation of criterion:

#### Mandatory requirements and scope

The mandatory elements of this criterion relate to upper limits on the specific CO2 emissions associated with the EN 197-1 cement production, the hydraulic lime production or the embodied carbon in materials used in alternative cements

For EN 197-1 cements and hydraulic lime, the scope of CO2 emissions calculation is the same that should be used for the Emissions Trading Scheme. This means that emissions from the combustion of fuels in the process and emissions from the combustion of organics and decarbonation of carbonates in raw materials is counted.

To avoid unnecessary confusion, the rules for estimating process emissions for the EU Ecolabel should simply follow those of the Emissions Trading Scheme and applicants should make reference to the relevant calculation methods for decarbonation when making the EU Ecolabel application. Criterion 5.2 makes specific reference to Regulation (EU) 2019/331 and Regulation (EU) 601/2012. It should be noted the latter has now been repealed by Regulation (EU) 2018/2066.

For the purposes of the EU Ecolabel, the carbon emissions associated with EN 197-1 should be counted per tonne of clinker produced (as with the ETS approach). This is clearly stated in the Parts C & D excel spreadsheet.

The producer of the binder simply has to insert a number for the specific CO2 emissions (in kgCO2 per tonne) but should also provide a further explanation in writing about the calculation method used and the scale of production and time period that the data refers to.

#### Embodied carbon for alternative cements

This separate approach for alternative cements was taken especially while having the very low cement clinker or cement clinker free cements in mind. However, it can also be applied to any other cement that does not fit with the EN 197-1 classification system. The main point is that all the embodied carbon from the cement ingredients are captured in the manufacturing of the alternative cement formulation (i.e. in life cycle stages A1 to A3).

Applicants are welcome to submit evidence of carbon footprints or LCAs for the alternative cement that include impacts beyond life cycle stages A1 to A3, but only the data for A1 to A3 will be considered when assessing compliance with the EU Ecolabel requirements.

- A declaration from the cement or lime supplier about the carbon emissions associated with the cement in line with the ETS method (i.e. fuel combustion and process emissions but not grid electricity consumption), with basic details about the calculation and assumptions used.
- Fill out the Parts C & D excel file worksheet for criterion 5.2.



## Criterion 5.3 – Emissions of dust, NOx and SOx to air

#### (i) Interpretation of criterion:

#### Applicability

This criterion does not apply to alternative cements in cases where the clinker content is less than 30%. However, if the clinker content in the alternative cement is greater than 30%, then information about emissions of dust, NOx and SOx for the clinker production does apply.

#### Mandatory elements

A mandatory limit is set for upper limits are set for specific emissions of dust, NOx and SOx emissions from the cement or lime kiln.

#### Scope of data

In a similar manner to criterion 4.4 for ceramics, depending on the complexity of the production set-up at the site where the cement or lime produced, and the share of total products from that site that will form part of the EU Ecolabel application, the representativeness of the emission data may vary if it is simply allocated on a per mass of production basis for the whole installation output. The main factors that would influence the representativeness of centralised data for the whole installation are:

- the share of total production at the site that is covered by the EU Ecolabel application
- the variability of raw material compositions in different products (especially sulphur)

- the variability of different firing schedules and air flow rates for different products (time and temperature profiles).

As the share covered by the EU Ecolabel decreases and the variabilities increase, the representativeness of centralised data for the EU Ecolabel decreases. If the applicant is also the cement or lime producer, then they should explain these aspects to the competent body if they wish to submit more detailed data that is allocated only to that part of their production which is relevant to the EU Ecolabel. If the applicant is the precast concrete producer, then it would be up to cement or lime producer to decide on whether full installation level or more specific product level data is most appropriate.

#### Frequency of data monitoring

Regarding emissions from the kilns, any installation with a cement clinker rotary kilns of capacity >50 tonnes/d, or other cement or lime kilns exceeding production capacities of 50 tonnes/d, will be subject to reporting requirements of the Industrial Emissions Directive (IED) 2010/75/EU. Harmonised emission reporting requirements were established in Commission Implementing Decision 2013/163/EU. These requirements should form the basis for any data submitted as part of the assessment and verification of criterion 5.3.

#### Units for data reporting

An important difference is that the Commission Implementing Decision 2013/163/EU sets limits in terms of exhaust gas concentration (i.e. mg/Nm3), whereas the EU Ecolabel sets limits based on production (i.e. mg/kg product). The key bridge between these two approaches is the <u>specific airflow rate</u>, which should be estimated in Nm3/kg of product. Both the annual average exhaust gas concentrations AND the average specific airflow rates would need to be provided in order to justify the final data submitted under criterion 5.3.



### How the interface looks in the Parts C & D excel worksheet

Since there are a number of cells that require entries for criterion 5.3, it is worth presenting how the cells appear in the Parts C & D excel worksheet.

	4 В	С	D	E	F	G H
20	Criterion 5.3. Emissions of dust, NOx and S	Ox to air				
21	Key data from emission inventory	Data input				
22	Kiln dust emissions		Units	]	Limit	]
23	Type of binder used	Alternative cement with >30% clinker			34.5	upper limit
24	Reference name for data entry				11.5	excellence limit
25 26	Data collection period: Has a declaration been provided from the manufacturer of the clinker or hydraulic lime about dust, NOx and SOx emissions and the calculation method?					
27	Relevant production during period:	5000	tonnes	Check	]	
28	Weighted average dust emission conc. during (	4	mg/Nm3		_	
29	Total airflow rate during period:	14000000	Nm3	2800	Nm3/t	]
30	Specific kiln dust emissions:	11	głtonne			Points
31	Specific kiln dust emissions lookup value:	<lower limit<="" td=""><td>głtonne</td><td>]</td><td></td><td>5.00</td></lower>	głtonne	]		5.00
32						-
33	Kiln NOx emissions		Units		Limit	
34	Type of binder used	Alternative cement with >30% clinker			1472	upper limit
35	Reference name for data entry				920	excellence limit
36	Data collection period:				-	
37	Relevant production during period:	5000	tonnes	Check		
38	Weighted average NOx emission conc. during	398.7	mg/Nm3			-
39	Total airflow rate during period:	14000000	Nm3	2800	Nm3/t	<u> </u>
40	Specific kiln NOx emissions:	1116	głtonne			Points
41	Specific NOx dust emissions lookup value:	1116	głtonne			3.22
42				1		,
43	Kiln SOx emissions		Units		Limit	
44	Type of binder used	Alternative cement with >30%			460	upper limit
45	Reference name for data entry				115	excellence limit
46	Data collection period:				-	
47	Relevant production during period:	5000	tonnes	Check		
48	Weighted average SOx emission conc. during (	34	mg/Nm3			_
49	Total airflow rate during period:	14000000	Nm3	2800	Nm3łt	
50	Specific kiln SOx emissions:	95	głtonne			Points
51	Specific kiln SOx emissions lookup value:	<lower limit<="" td=""><td>głtonne</td><td>]</td><td></td><td>5.00</td></lower>	głtonne	]		5.00

The cells with required inputs (green cells) start in C23, where the type of binder is defined (also in C34 and C44). The applicant can then define their own reference name for this data entry (cells C24, C35 and C45). Cell C26 refers to the basic explanations of the calculation method from the producer of the cement clinker or hydraulic lime.

The three key data are, in the case of dust emissions, in cells C27, C28 and C29. These three numbers for the basis for the specific airflow rate (automatically calculated in cell E29) and the specific dust emissions (automatically calculated in cell C30). Any obvious order-of-magnitude input errors should be easy to spot in the excel outputs. Depending on the value in cell C30, the total points awarded in relation to kiln dust emissions appears in cell G31. For ease of reference, the applicable EU Ecolabel limits are stated in cells F23 and F24.

The same approach for dust also applies for NOx and SOx.


- A declaration from the cement or lime supplier about the dust, NOx and SOx emissions associated with production, specifically referring to the data collection period, production rates during this period, the average emission concentrations (clean gas) during this period and the average specific airflow rate during this period.
- Fill out the Parts C & D excel file worksheet for criterion 5.3 using the relevant information provided in the declaration (or directly by the applicant if the license is to be awarded to the cement or hydraulic lime product).



# Criterion 5.4 – Recovery and responsible sourcing of raw materials

# (i) Interpretation of criterion:

### Mandatory elements

Applicants are required to have in place procedures for in-situ or ex-situ recycling of returned or rejected concrete products.

The applicant is also required to identify the approximate transport distances of all the main virgin, recycled and secondary raw materials used in their production. This should apply to aggregates (coarse and fine) as a minimum, and could potentially be extended to fillers.

Before considering the potential environmental benefits of recycled or secondary materials, it is necessary to make sure that they are not sourced from much further away than the virgin raw materials used. As a very general rule of thumb, if the transport distance is more than 2.5 times that of the virgin raw material, the environmental benefits of the recycled or secondary material can be largely cancelled out by the extra impacts due to longer transport.

Consequently, the first information that the applicant needs to provide is a list of all the raw materials and recycled or secondary materials used, and how far these sources are from the factory. Information about the locations of virgin aggregates should already be available due to the requirements of criterion 1.1.

In cases where materials are supplied by an intermediary, any transport from the source to the intermediary shall be counted in addition to transport from the intermediary to the agglomerated stone producer. Upon request, contact details of suppliers should be provided to the Competent Body.

#### Accounting for recycled and secondary content

In terms of counting recycled materials, any reuse of process waste from the factory shall not be credited as recycled material if it is going back into the same production process that generated it.

Because the precast production process is essentially a batch process, it is possible to identify, distinguish and specify recycled/secondary material contents at a high level of granularity. Consequently, a number of different scores could be generated here for different products covered by the same EU ecolabel license application.

In order to ensure that the inputs of recycled and secondary materials are sufficient to account for any claims on such contents in outgoing products, the applicant needs to keep an inventory of ingoing and outgoing recycled/secondary materials (see the excel file screenshot below for more details).

#### Accounting for responsibly sourced content

A similar approach applies for responsibly sourced aggregates and a simpler "Yes/No" approach applies for responsibly sourced cement.

# How the interface looks in the Parts C & D excel worksheet

Since there are a number of cells that require entries for criterion 5.4, it is worth presenting how the cells appear in the Parts C & D excel worksheet.



#### EU ECOLABEL USER MANUAL HARD COVERING PRODUCTS

Commission Decision (EU) 2021/476 for the award of the EU Ecolabel for HARD COVERING PRODUCTS

	A B	С	D	E	F	G	H I	J K	L			
53	3 Criterian F. A. Bernard and a starting of superstantials											
54	Turne of binder used	Portland compatible		ing of raw i		Dointo			Bointo			
55	If Pertland extreme used is it responsibly equira-	Vac	-		LOOKOP	5.00			POINTS			
56	Ir Portiand cement used, is it responsibly sourc	Tes		1		5.00						
57	Material source(s)	Transport distance	Units	1								
58			km	-								
59			km ture	-								
60			KM kee	-								
62			kro	-								
63			km	1								
00				1	Uutput	s about	Hesponsibly	7				
	Reference name for data entry	Recycled content			гесуе	cledi	sourced					
~	Nelefence name for data entry	Recycled content			secor	ndary	aggregate					
64 CE		15	0/	1	 15	and the second	content	/	2.25			
66		1.0	/o 9/	-	1.5	0.333333	60	-0	3.20			
67			/* */	-	0			-0				
68			%	1	0			-%				
69			%	1	Ő			- %				
70			%	1	Ū			- %				
			Outgoing	Balance								
74	Recycled/secondary material inventory	Incoming (tonnes)	(toppos)	(toppool								
72	a a lapuaru 20XX		(tonnes)	(tonnes)			Peouolod					
73	e.g. Sahuary 2000			0			secondar					
74	e.g. March 20XX			0			u material					
75	e.g. Anril 20XX			n			inventory					
76	e.g. May 20XX			Ō			result					
77	e.g. June 20XX			Ū			Pass					
78	e.g. July 20XX			0								
79	e.g. August 20XX			0	1							
80	e.g. September 20XX			0								
81	e.g. October 20XX			0								
82	e.g. November 20XX			0								
83	e.g. December 20XX			0								
84												
	Responsibly sourced material inventory	Incoming (tonnes)	Outgoing	Balance								
85	hesponsist sourcea material interest	incoming (connect)	(tonnes)	(tonnes)								
86	e.g. January 20XX			0			Responsi					
87	e.g. February 20XX			0			Ыу					
88	e.g. March 20XX			0			sourced					
89	e.g. April 20XX			0			material					
90	e.g. May 20XX			0			Inventory					
31	e.g. Julie 20XX			0			Mass					
93	e.g. Jugust 20XX			0								
94	e.g. September 20XX			0								
95	e.g. October 20XX			0								
96	e.g. November 20XX			0								
97	e.g. December 20XX			0								
00												

The first input cells (C55 and C56) relate to whether or not responsibly sourced cement is relevant and used. If it is, then 5 points are awarded in cell G56.

The next inputs (rows 58 to 63) refer to definitions for the different aggregate sources used and the associated transport distances (these should be distances calculated from real transport routes, not simple straight lines drawn on a map between source and destination). The main purpose here is to qualify or disqualify any secondary or recycled material sources as being valid for the accounting (i.e. are they sourced more or less than 2.5 times as far away as the vrigin materials used?). If more materials need to be defined, users should insert more rows.

The next inputs (rows 65 to 70) refer to self-declared recycled or secondary material contents for specific products (Column C) and for self-declared responsibly sourced aggregate fractions (Column H). The recycled content should be selected from the drop-down list (options are rounded to the nearest 0.5%). If more products need to be defined, more rows can be inserted.

The next inputs relate to the inventroy of inputs and outputs of qualified recycled/secondary materials (rows 72 to 83) and responsibly sourced materials (rows 86 to 97). For ANY claim on recycled/secondary material to be valid, it is essential that the balance of recycled/secondary materials never falls below zero. The same principle applies for responsible sourced content claims.



Practically speaking, the only way the applicant can keep track of recycled/secondary material flows is to develop a system of credits/debits that is recorded on any delivered material invoices (credits), product shipment invoices (debits) and waste shipment notes (debits). The applicant should keep in-house records of these flows and ideally state the claimed recycled/secondary material contents on any outgoing products and batches.

## Required documentation for Assessment and verification:

- Fill out the Parts C & D excel file worksheet for criterion 5.4.
- (If points are claimed) evidence from the cement supplier that the cement is responsibly sourced.
- (If points are claimed) evidence from the aggregate supplier that the virgin aggregates is responsibly sourced or sourced from secondary or recycled materials.
- (Upon request) a copy of the records kept for tracking flows of recycled and secondary materials.



# Criterion 5.5 – Energy consumption

# (i) Interpretation of criterion:

### Mandatory part

The mandatory element of this criterion is to implement a plan to systematically monitor, record and reduce specific energy consumption and specific CO2 emissions. The monitoring and recording system should amount to an inventory of fuel and electricity consumption and of production output. Evidence of electricity consumption should come from meter readings and bills. The monitoring of fuel consumption will depend on how fuel is handled onsite, but delivery notes, receipts and invoices will normally be the most appropriate way. Production output should be self-explanatory, referring to actual <u>saleable products</u> (and not necessarily <u>sold production</u> as such).

The energy inventory for the precast plant should cover a period of at least <u>12 months prior to the date of</u> <u>award of the EU Ecolabel</u>. Because it was not possible to identify concrete benchmarks of energy consumption per unit of production output during background research, no pass/fail limit has been set in the criterion. So the main challenge is simply to gather the data in the first place. In cases where the data collection is something new for the applicant, it is recommended to start the application prior to the inventory having 12 months of data (e.g. a 6 month inventory might work at the beginning of the application process if the processing of the application and <u>award of the EU Ecolabel</u> was to take another 6 months – obviously presuming that the inventory is kept up to date during the application process).

The CO2 footprint for consumed electricity should be specified, so that it can be translated into CO2 footprints. If more than one electricity source is used and each has a different CO2 footprint, a weighted average CO2 footprint should be used. The type or types of fuel used should also be specified, for the same purpose.

If fuel is converted to electricity onsite (e.g. diesel generators) this should only be counted once, as the primary energy source (i.e. the fuel). If a combination of renewable electricity generated onsite and grid electricity is used, the metering should be set up so that all <u>consumption onsite</u> can be counted, regardless of where it comes from and if it is associated with a bill or not.

Care should be taken about the scope for fuel consumption, especially if the fuel consumption of vehicles that travel offsite is included or not. The simplest option would be to exclude vehicles that are used offsite, as this could be influenced by factors that are not related to the production process (e.g. employee travel to homes and elsewhere). However, the criterion leaves it up to the applicant to define the exact scope and then to apply it consistently.

#### Renewable energy (15 points in total)

For clarity, the first 10 points that are available refer to the share of renewable energy (i.e. electricity plus fuel). The next 5 points refer to how renewable electricity is sourced, <u>regardless of how much of the total</u> <u>electricity is due to renewables</u>. In cases where renewable electricity comes from more than one type of contracting (e.g. onsite generated via PV panels and a share of renewables in a green tariff from the utility supplier) the source that accounts for the largest share of renewable electricity shall be chosen.

#### Carbon footprint analysis (5 points in total)

The information required in criterion 5.5 (together with information about other criteria) could be used as a basis for a carbon footprint analysis. If such an analysis has been done in line with ISO 14067, 3 points shall be awarded. If it has been done in accordance with PEF methodology, 5 points shall be awarded. Any other



methods used will not result in the awarding of points unless a suitable equivalence can be justified to the Competent Body.

# How the interface looks in the Parts C & D excel worksheet

Since there are a number of cells that require entries for indicator 5.5, it is worth presenting how the cells appear in the Parts C & D excel worksheet.

4	A B	С	D	E	F	G	н
100	Criterion 5.5. Energy consumption						
101	Reference name for data entry						
	Has an energy inventory been kept for fuel and		1				
102	electricity consumption at the quarry?						
	Is there a plan to reduce specific energy		1				
103	consumption and CO2 emissions at the quarry?						
104	Key data from energy inventory	Data input	Units				
105	Time period of data collection:						
106	Approximate density of stone:	2450	kg/m3				
107	Saleable products produced during this period:	20408.2	m3				
108	Saleable products produced during this period.	450	tonnes			_	
109	Total electricity consumption:	50000	kWh		356	gCO2 ec	µ/kWh
110	Total electricity CO2:	17800	kgCO2 eq.				
111	Fuel-1 consumption (quantity):	73919.38776	Units		40	MJunita	of fuel-1
112	Fuel-1 consumption (energy):	2956775.51	MJ		100	g CO2 e	q.łMJ fuel-1
113	Fuel-1CO2 emissions	295677.551	kgCO2 eq.				
114	Fuel-2 consumption (quantity):		Units			MJunito	of fuel-2
115	Fuel-2 consumption (energy):	0	MJ			g CO2 e	q./MJ fuel-2
116	Fuel-2 CO2 emissions	0	kgCO2 eq.			_	
117	Fuel-3 consumption (quantity):		Units			MJunito	of fuel-3
118	Fuel-3 consumption (energy):	0	MJ			g CO2 e	q./MJ fuel-3
119	Fuel-3 CO2 emissions	0	kgCO2 eq.			-	
120	Total fuel consumption (energy):	2956775.5	MJ				
121	Total fuel CO2:	295677.6	kgCO2 eq.				
122	Total energy consumption (kWh)	871326.5	kWh				
123	Total energy consumption (MJ)	3136775.5	MJ				
124	Total CO2:	313477.6	kg CO2 eq.				
125	Specific energy consumption (kWh/m3)	42.7	kWh/m3				
126	Specific energy consumption (kWht)	1936.3	kWhłtonne				
127	Specific energy consumption (MJIm3)	153.7	MJ <b>i</b> m3				
128	Specific energy consumption (MJH)	6970.6	MJitonne				
129	Specific CO2 (per m3)	15.4	kg CO2 eq./m3			-	
130	Specific CO2 (per tonne)	696.6	kg CO2 eq./tonne		Points		
131	Percentage of energy that is renewable	54	%		5.40	out of 10	
132	Type of renewable electricity used (if any)	Green tariff from utility supplier			2.00	out of 5	
133	Has an ISO 14067 or PEF method analysis of the products carbon footrpint/global warming impact been carried out?	Yes, ISO 14067			3.00	out of 5	

Cells in green must be filled out and cells in red generate results automatically. The first green cell (C101) refers to the name that will be associated with the data entry (it could simply be the name of the product and an internal recipe mix reference). In cells C102 and C103, the applicant is required to confirm that they are meeting the mandatory elements of criterion 5.5. It should be noted that the competent body may ask for more details about what is behind the "Yes" entries to C102 and C103.

The next 6 rows that define the period and the quantities of material extracted and production output (i.e. of saleable products). The approximate density of the stone is important for converting units from m3 to tonnes. In cases where more than one one density might apply, the applicant should estimate a weighted average density for products covered by the same energy data.

The first input relating to energy consumption appears in cell C109 (electricity, in kWh). An input is also required for the carbon factor of the electricity used (cell F109). This will automatically generate a total electricity CO2 in cell C110. With fuel consumption, it is necessary to define the quantity of fuel consumed (in volume or mass) and then to define both the calorific value of the fuel and the carbon factor of the fuel. The



choice of units is not so important, but the units must be consistent between the related entried (e.g. cells C111, F111 and F112 for fuel-1).

Since each fuel has its own specific calorific value and carbon factor, it might be complicated to make a weighted average estimation for multiple fuels in a single entry. For this reason, scope is made in the excel file to define 3 separate types of fuel input.

The CO2 factors for the fuel and electricity should be based on information from the suppliers. In cases of doubt about fuel factors, the values in Annex VI to Commission Implementing Regulation (EU) 2018/2066 could be used.

The next rows (120 to 124) are simply the automatically calculated totals for energy and CO2 and specific energy and CO2 (rows 125 to 130). The automatic calculations for total energy (i.e. fuel plus electricity) already take into account the conversion factor for kWh and MJ (i.e. 1kWh = 3.6 MJ). The values in cells C33 and C35 are automatically shown in the "Summary worksheet".

It should be noted that the specific energy consumption is based on the total saleable material produced and NOT the total material processed. So one way to improve specific energy consumption and specific CO2 emissions is to improve reduce wastage rates.

The final three rows are where points are awarded. The first one relates to the share of renewable energy (i.e. fuel plus electricity). The next row is about the major mechanism for contracting renewable electricity and the final row is about if and how a carbon footprint has been carried out for the products.

By obtaining the data necessary to fill out the excel sheet for criterion 5.5 and combining this with the relevant information in criteria 5.1 to 5.4, most of the key information needed for doing a carbon footprint analysis should already be available. So applicants are encouraged (but not obliged) to go a step further in order to obtain an extra 3 or 5 points.

## Required documentation for Assessment and verification:

- (Upon request) a copy of the fuel and electricity inventory for the relevant period where data was submitted, which also explains the scope of processes and operations covered by the inventory.
- (Upon request) a copy of the plan to reduce specific energy consumption and CO2 emissions for production output.
- Fill out the Parts C & D excel file worksheet for criterion 5.5, specifying the quantity of products produced and the total fuel and electricity consumption during the same period.
- (Upon request) copies of meter readings, bills and invoices for electricity and fuel to justify the numbers entered.
- (If points are claimed for carbon foot-printing) A copy of the carbon footprint certificate or EPD, stating that the method is in line with ISO 14067 or PEF.



# Criterion 5.6 – Environmentally innovative product designs (optional)

# (i) Interpretation of criterion:

As this is a purely optional criterion, there are no mandatory elements. However, if applicants wish to claim points under this criterion, the following it would be necessary to make some self-declarations about the product(s) in question and, in some cases, support this with relevant test reports.

- declarations on high infiltration rates need to be supported by a test report. If this is due to porous interlocking mechanisms, then the test should be conducted on interlocked units and not individual units.

- declarations on voids content can be simply assessed visually in cases where externally visible voids are the main influence on void content and the product is geometrically straightforward. In cases where internal void spaces are claimed, more detailed measurements of open and connected porosity or estimations related to reduced material density could be justified.

- for any thermal conductivity claims, it will be necessary to submit test reports.

- for hydraulic binder or alternative cement content, the main basis will be on the self-declaration, although in cases of doubt, the competent body could request an inspection to the site to visually assess the mixing and batching of relevant products.

- for grass pavers, the self-declaration can be visually confirmed by the competent body.

# Required documentation for Assessment and verification:

- Fill out the Parts C & D excel file worksheet for criterion 5.5, specifying the quantity of products produced and the total fuel and electricity consumption during the same period.
- (Only if points are claimed) copies of any relevant test reports, technical drawings and self-declarations.