Introducing an EU harmonised product information system

When it comes to making available information on products and materials, there are already different pieces of EU legislation that demand for mandatory disclosure of specific information from manufacturers who want to sell their products and services on the European single market. These include the implementing measures under the Ecodesign and Energy Labelling Directives, Article 15 WEEE (Waste Electrical and Electronic Equipment) Directive and Article 33 of the REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) Regulation. An EU harmonised product information system would go one step further in combining these single bits of different environmental information into a standard digital format and making them more easily accessible for distinctly defined target groups.

Different stakeholders agreed on the basic idea at the European Resource Efficiency Platform (EREP). This sent policy recommendations to the European Commission in March 2014 that stated: *"Inadequate business-to-business information on what resources a product contains and how it can be repaired or recycled is hindering resource efficiency. To tackle this barrier, the possible use of a 'product passport', such as an Environmental Product Declaration, should be explored that would make such information easily accessible and applicable to the supply chain, thus facilitating efficient material flows and encouraging the creation of value in the circular economy."*

An EU harmonised product information system should be understood first as an approach to centralise and optimise the reporting and use of legally required information. Which data should be chosen? The initial focus should be on information firms are required to produce anyway. Product tags, such as a label or QR code linking to more detailed online information, could also be considered to make the information easily accessible and usable in the supply chain. This could be linked to an EU database as proposed under the revised EU Energy Labelling Directive.

Obligations for manufacturers to provide reliable information must be put in perspective of the expected benefits. For example, leveraging and easing business activities along different value chains, supporting information schemes for procurers and end-consumers as well as easing verification and market surveillance. Such information must be based on clear standards to be meaningful, measurable and enforceable.

National pilots and collaboration between member states could pave the way to a practical European solution. Standardising the technical and environmental information on product properties relevant to facilitate a circular economy could build on the experiences with existing voluntary schemes, such as cradle-to-cradle® certification, environmental product declarations, chemicals or recycling passports.

Establishing an EU harmonised product information system would reduce administrative costs for business according to the principle of 'report once and use several times'.

When deciding if certain information should be made public, industry usually pleads for confidentiality. We believe policymakers must balance open access with the need for commercial sensitivity if we want to stimulate competition between manufacturers with regards the performances of their products and develop repair and recycling services and new servitising models, such as leasing and sharing platforms.

The solution could be found in defining distinct stages of access levels for:

➢ Market surveillance authorities enforcing the law;,
➢ Professional and qualified service providers for repair, maintenance, refurbishment, remanu-facturing and/or recycling;
➢ Public procurement departments checking compliance with their GPP criteria, and;
➢ Consumer organisations or private consumers to guide their purchasing decisions.

Making relevant information on products and services available and transparent is one of the foundations of a free market economy claimed by most business actors. Confidentiality should thus not be the starting point and not be overstated at the expenses of transparency and circular economy development. Finally, it is worth noting that a harmonised product information system could evolve as a comprehensive tool to document information on environmental performances of products and to allow for monitoring chemical content along various product lifecycles and the associated value chains. In brief, such a system would gather these crucial types of information and combine them in a centralised, digital system.

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