

To the members of the EU Ecolabelling Board

Ref.: BEUC-X-2016-116

Brussels, 15 November 2016

Re: Open letter regarding EEB and BEUC concerns on the future of the EU Ecolabel Regulation and on the fate of specific product groups

Dear Members,

The EEB and BEUC are extremely concerned about the future of the EU Ecolabel Regulation and about the fate of the product groups covered by the scheme.

With this letter we call on you, members of the EU Ecolabelling Board (EUEB), to urge the Commission to publish the results of the REFIT process and to stop immediately any deliberation on the discontinuation of product groups before evidence is available and a transparent consultation process involving the EUEB members is organised.

Leaked documents [reported by the media](#) show that the College of Commissioners addressed crucial considerations for the future of the EU Ecolabel scheme within the orientation debate which took place on 25 October regarding the Ecodesign Work Plan 2015-2016.

As consumer and environmental organisations, we have sent [a letter](#) to President Juncker, with the College of Commissioners in copy, to express our deep concerns on the reported outcome of that meeting.

First, with reference to the discussion on the ongoing REFIT process of the EU Ecolabel Regulation, the documents state that "*once the results [of the Fitness Check] are published a reflection is needed on the continuation or not of the scheme based on its effectiveness, take-up and EU added value*". The interim results of the evaluation study carried out in 2014 showed that **95% of respondents to the public consultation supported the continuation of the scheme**. Therefore the proposal considered by the College of Commissioners to reflect on whether the scheme should be continued or not is unacceptable and incomprehensible. Indeed, it contradicts the broad support that the EU Ecolabel Regulation received during the public consultation.

The EU Ecolabel does not only empower EU citizens to make sustainable purchases against the proliferation of misleading green claims and labels. It also helps companies to market green products across the EU with fewer administrative burdens as they can refer to one set of ecological criteria in all EU countries.

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The publication of the results of the Fitness Check has by now taken unacceptable delays, adding even more reasons for concern on the future of the scheme and raising strong governance questions for the entire process.

By February 2015, the Commission was due to submit a report to the European Parliament and the Council on the implementation of the EU Ecolabel scheme, and to identify elements for a possible review of the scheme. However, almost two years have passed without the publication of such report. Whereas the EUEB was informed by the Commission in January 2016 that the REFIT documents would be published by spring 2016, it is still uncertain if a presentation of the REFIT results, which has been included in the agenda of the EUEB meeting on 24 November, will take place at all.

Secondly, we are extremely worried by the fact that the College of Commissioners is considering candidates for discontinuation from the list of products and services in the pipeline for voluntary Ecolabel criteria until 2018. From the leaked documents reported by the media, three product groups have been highlighted for a possible end: tissue paper, newsprint and flushing toilets and urinals.

The EU Ecolabel for Tissue Paper is one of the most successful products covered by the scheme: 133 licenses were awarded to companies and around 7,000 products in the EU market bear the label. In addition, the criteria covering tissue paper and newsprint have been revised since 2015 and resources have been put into this process.

Such a choice is completely arbitrary and not based on evidence. It is all but transparent since it has never been discussed with the members of the EU Ecolabelling Board. It also shows an important disconnection with the different streams of work that the EUEB is currently undertaking and lacks understanding of the scheme.

Based on the above considerations, the EEB and BEUC are all the more concerned that the College of Commissioners could consider even more product groups for discontinuation.

Decisions on the discontinuation of specific product groups should not be taken before the REFIT results are published and prior to a sound analysis. **Evidence is needed first** to understand what are the drivers and barriers for the success or low uptake of the different product groups covered by the scheme. At the moment an evaluation and analysis on the overall impact of the EU Ecolabel Regulation is missing.

In terms of governance, decisions on the fate of product groups, which are key for the EU Ecolabel, should not be taken unilaterally by the Commission. We urge you to call on the EU Commission to involve the EU Ecolabelling Board and its Strategic Task Force on EU Ecolabel Uptake in any process identifying product groups as potential candidates for discontinuation.

Kind regards,

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EEB and BEUC

In view of the public interest in this matter, we intend to make this letter publicly available.