

# **BEUC and EEB final policy recommendations on EU Ecolabel criteria for Footwear**

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This paper provides BEUC and EEB recommendations on the final version of the Ecolabel criteria for Footwear that has been circulated by the European Commission (EC) ahead of the vote by Regulatory Committee on 27 November 2015. BEUC and the EEB highly recommend the EC to take further action in order to improve the final criteria before the vote in line with the objectives of the EU Ecolabel. We will not support the draft proposal unless the European Commission brings significant improvements on the following points of concern.

We highly recommend banning Polyvinyl Chloride (PVC) from the Ecolabel Footwear in accordance with the EU Ecolabel Regulation (EC 66/2010) which requires that criteria shall be determined on a scientific basis considering the whole life cycle of products. There is today strong evidence that vinyl chloride, the main component of PVC, has severe harmful effects on human health and the environment from the manufacturing phase until the end-of-life stage. Cancer is the major risk occurring from oral exposure to vinyl chloride which is classified as Carcinogenic Category 1A. PVC additives such as phthalates are very toxic to consumers due to their very high concern properties and its exposure is also suspected to provoke reproductive disorders in male population. It is therefore widely acknowledged that PVC contains a high volume of toxic chemicals which can leach out of the material and presents a source of exposure for consumers including children.

Another major concern is that PVC's highly toxic compounds have significant negative environmental impact, such as dioxins which are volatile pollutants. Hazardous substances present in PVC undermine the recyclability of the material and re-injecting hazardous substances in recycled material is in total opposition to Europe's circular economy ambition. Therefore, the presence of one of the most toxic materials is not acceptable in a product which is awarded a label of environmental excellence and seen as a frontrunner by European consumers.

BEUC and the EEB hold the view that flame retardants should be excluded from the Ecolabel Footwear. As there are today a growing number of safer alternatives to meet fire safety requirements available on the market<sup>1</sup>, our demand is consistent with the articles 6 of the EU Ecolabel Regulation<sup>2</sup> on the restriction of hazardous substances. We therefore call on the EC to require the use of safer alternatives such as flame inherent fibres or intumescent systems in EU Ecolabel products.

Finally, we do not support the 3 % weight by weight threshold set by the JRC under which materials do not have to comply with criteria on hazardous chemicals. This high limit is contradictory with the precautionary principle and we are very concerned that it will lead to a high amount of undesirable chemicals in the EU Ecolabel products.

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<sup>1</sup> See <http://pinfa.org/>.

<sup>2</sup> Regulation (EC) No 66/2010 of the European Parliament and of the Council of 25 November 2009 on the EU Ecolabel.