



The Consumer Voice in Europe

EU Ecolabelling Board

13 December 2018

Subject: EEB and BEUC comments to the Study "identification of elements for a future Strategy of the EU Ecolabel "

Dear members of the EU Ecolabelling Board and study team,

We very much welcome the initiative taken by the Commission for setting a strategy for the next 10 years with the aim of making the scheme more efficient and effective. This is an opportunity to expand the Ecolabel to more product groups relevant for consumers and green public/corporate procurement. Below we provide comments to the findings of Task 1 and Task 2 of the study supporting the development of the strategy.

Task 1 – Evidence gathering and analysis of the market context for the identification of windows of opportunities for the EU Ecolabel

We think that the study should go beyond the proposal of a list of products and services to be covered by the Ecolabel. It would be important to cross-check this list against an analysis of key questions support a prioritisation and creation of clusters enabling a better communication and marketing of the EU Ecolabel? How does the scheme relate to what matters for the environment and for consumers? What are the key concerns for society and where are the policy drivers? Where can the EU Ecolabel effectively drive improvements and support changes needed?

There should be a clear correlation between the EU Ecolabel Strategy for the selection of product groups and the EU Ecolabel Communication Strategy, also to be developed in 2019. For example, there is social interest and policy actions around climate change, shifting consumption patterns from single use packaging to reusable goods, emphasis on zero waste, avoiding hazardous chemicals in products, healthy lifestyles or new business models supporting the circular economy. Could those areas become the new windows of opportunity for increasing the visibility of the EU Ecolabel? They should be part of a prioritisation analysis.

It is obvious that more resources are needed not only for communication but also for criteria development. It is urgently needed to increase the portfolio of product groups covered by the Ecolabel and this requires speeding up criteria development.

The study should also address scenarios with the available and increased resources, as well as options for optimising them. A possible way could be seeking increased cooperation between the EU Ecolabel and regional/national Ecolabels for criteria development. Looking at products and services not yet

covered by the EU Ecolabel and where national and regional ecolabels are successful could be a determining factor to identify where to start.

While ensuring coexistence of regional and national ISO Type 1 Ecolabels across Europe, more integration and cooperation between schemes could contribute to optimising processes for criteria development and revision. The integration of criteria already available in other ecolabels (Article 11.2 of the Ecolabel Regulation) could also help to select the priority product groups in the next ten years.

Additionally, the EU Ecolabel Strategy should also consider which role can the EU Ecolabel play as part of the broader product policy framework. We think that there are options for better integrating the different product policy tools. While, the EU Ecolabel is less successful for product groups where Ecodesign exist, this is not a reason to discontinue the scheme on those areas. On the contrary, the requirements could be developed within the same decision-making process.

Last but not least, we should prioritise sectors where the EU Ecolabel can really have an influence to drive environmental improvement and behavioural changes towards sustainable consumption.

Concluding that the sectors that account more to the total life cycle impact of products are *food and drink, transport and housing*, does not necessarily make the EU Ecolabel the best policy tool for any product or service category related to those areas. For example, why would this justify developing an EU Ecolabel for food and drinks for which a well-known label already exists? Will an Ecolabel for food and drinks support a shift from consumption of meat towards plant-based menus?

We think that instead of developing a competing label to the EU Organic Label (and national/private Organic Labels), the EU Ecolabel could better drive improvements in the sector if it would apply to services such as restaurants, catering services for school, events or recreational activities. In these sectors it can also support green public and corporate procurement focus on the reduction of food waste, single use packaging and the organic production of food.

Task 2 - Identification and assessment of scenarios for the EU Ecolabel

Should the EU Ecolabel be awarded to a homogenous or heterogenous group of products and services?

Visibility of the EU Ecolabel in shop shelves or online shops is the best marketing tool! Consumers and procurers should have the option of buying green in as many categories of products as possible. We think it is necessary developing the label on a wide and heterogenous range of sectors so that it can clearly be identified by consumers with a label for sustainable consumption. Higher visibility on some sectors can also help to support awareness on the other areas were the label might be less used by producers but still have some uptake.

A homogenous approach would dilute the relevance of the EU Ecolabel. Other regional/national ecolabels in Europe cover a wide range of sectors with a different degree of success among them. The EU Ecolabel should as priority focus on successful areas from those schemes not yet covered, allowing integration of already available criteria and potential success in other countries where the other schemes are less relevant.

Should the EU Ecolabel focus mainly on consumable goods or durable goods?

Both areas are relevant for the scheme. The starting point should be every day products. However, the Ecolabel has the opportunity of promoting more sustainable consumption patterns and contributing to support the circular economy.

In the area of consumables, the EU Ecolabel has the potential to combine society interest on waste reduction and avoiding hazardous chemicals in products. It could cover consumable goods with focus

on reusability or alternatives to single use plastics. As example, alternatives to single use plastic bottles such as refillable plastic drinking bottles and single use plates made of other materials come along with health concerns: consumer testing has shown that they also may concern hazardous chemicals which can leak into food and drink¹.

There are consumable goods covered in other regional/national ecolabels which can complement clusters for the EU Ecolabel. For example, there are already criteria for converted paper but none for pencils, glues,... there could be an opportunity to create a line of school/stationary office items.

With regards to durable goods, the EU Ecolabel should keep in the scope bed mattresses, furniture and other durable goods such as electric and electronic appliances. While the success of these product groups is lower, we could circular business models in the sector of durable goods. The EU Ecolabel could find some space in the promotion of new patterns of production and consumption, such as refurbishment options for furniture or leasing services of second-hand goods, such as second-hand computers, white appliances or clothes.

Should the EU Ecolabel focus mainly on products with a health connotation (direct and indirect effect)?

When buying green products consumers want to play a role for protecting the environment. However, health is an important factor in the purchasing decision. Potential users of the label are likely to ask themselves, what is in the label for me? Selecting product groups with a bigger potential for communicating the benefits that the label brings to the environment and to the people can lead to a greater uptake of the scheme.

4 out of 5 consumers are concerned about the presence of chemicals in the products. Therefore, this can be an important factor when selecting products where interest from consumers in relation to reduced hazardous chemicals are higher. This is in line with the aim of the EU Ecolabel to substitute hazardous chemicals.

The connection with health and children could be a good strategy to call for the attention of consumers. For example, materials children use in school (like pencils or backpacks) or at home, such as toys or child care articles.

Should the EU Ecolabel cover more products and services relevant for Green Public Procurement?

Yes! It would be feasible in terms of resource management if the GPP criteria development process are always aligned with the EU Ecolabel. It would also be needed to increase awareness among purchasers on how they can use the EU Ecolabel and other relevant Ecolabels in their tendering procedures. For instance, low uptake in a specific category can be a barrier preventing procurers to make a reference to the EU Ecolabel. However, best practices can be shared such as the use of award points and involvement of those sectors (see [example from the city of Copenhagen](#) meeting sectors where Ecolabel has less uptake to anticipate their demand of Ecolabelled products in public procurement in the coming years).

Since resources are limited, ideally, we should prioritise those sectors that are common for consumers and green public/corporate procurement.

¹ See <https://www.forbrukerradet.no/side/drinking-bottles-leach-chemicals> and https://www.oekotest.de/bauen-wohnen/20-Einweggeschirr-aus-nachwachsenden-Rohstoffen-im-Test_111087_1.html

Should the EU Ecolabel cover more B2B products and services?

Given limited resources it would be needed to focus on those sectors for B2B where there are synergies with Green Public Procurement and B2C. Consumers visibility of the label should have the priority.

Should the EU Ecolabel be extended to more services while focusing on circular economy aspects?

Expanding to services can offer a window of opportunity to promote business models enabling more circular consumption and production. For instance, special consideration could be given to repair services, refurbishment and reuse of goods and leasing of second-hand goods aimed at ensuring the durability and more intense use of products (e.g. computers, clothing, toys).

It is important to avoid ecolabelling services which can have a rebound effect and trigger higher consumption of new goods as the objective should be minimising material consumption.

Should the EU Ecolabel cover Ecodesign/EU Energy?

This could be considered for within a coherent product policy framework. If Ecodesign, Energy Label and Ecolabel criteria are developed simultaneously for a product group an approach could be tested to apply same metrics for building different ambition levels for the worst and the best products (see: [EEB paper on policy options for the circular economy](#)).

How should the EU Ecolabel position itself in respect to other Type 1 Ecolabels?

The EU Ecolabel is available across the EU. In terms of demand it is the relevant label for countries that do not have strong national/regional Type 1 Ecolabels. It is also of interest for companies that located in countries with national/regional strong ecolabels but selling their products to other markets (because of requirements from retailers, consumers demand or GPP requirements).

The Commission should investigate how we can make use of criteria sets that are already available in other regional/national ecolabels and not yet covered by the EU Ecolabel.

Should the EU Ecolabel focus more on construction & building?

The construction sector is a priority sector for the circular economy. The EU Ecolabel should be expanded to more construction products. This can also help to expand its visibility in a sector that is increasingly integrating demands for healthy (indoor air quality)/sustainable buildings (energy, resource efficient, less impacts on climate change).

Should the EU Ecolabel cover more types of personal care products?

Yes. In addition to expanding the scope to all cosmetics, children articles (not only for personal care) can be of interest. Recent tests from Stiftung Warentest have shown that even though children are more vulnerable, products for them are much more often dangerous than in other tests for products for adults. Children articles is an area where more regulation is needed.

Should the EU Ecolabel cover food, feed and non-alcoholic beverages?

While we see an opportunity in covering food related services (see above), we do not think that the EU Ecolabel is the best tool for food and drinks.

The EU Ecolabel to food products would increase the risk of creating a duplicate of organic certification as the EU organic label already exists. An overlap between an Ecolabel on food products and the organic label would be both misleading and confusing for consumers.

With hundreds of different logos/labels currently being used on food products across the EU, the ecolabel could be just another in a proliferation of labels. For us the focus should be on strengthening/expanding the criteria behind those logos already recognised and used by consumers most notably the organic logo.

We recommend integrating sustainability criteria about processing, packaging and transport into the EU organic label criteria where applicable. Second, there are strong limitations on the practicability and effectiveness of applying the EU Ecolabel to food products.

We remain at your disposal should you have any questions.

Kind regards,

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