



ANEC/BEUC PRELIMINARY THOUGHTS IN VIEW OF THE REVISION OF THE EU ACTION PLAN ON SUSTAINABLE CONSUMPTION & PRODUCTION *(SHORT VERSION)*

FEBRUARY 2011

Contact: Laura Degallaix (ANEC) – laura.degallaix@anec.eu
Sylvia Maurer (BEUC) – environment@beuc.eu
Ref.: X/022/2011 - 28/02/11
ANEC-ENV-2011-G-004

ANEC, the European Association for the Co-ordination of Consumer Representation in Standardisation
Av. de Tervueren 32, box 27 – 1040 Brussels - +32 2 743 24 70 - www.anec.eu
EC register for interest representatives: identification number 507800799-30

BEUC, the European Consumers' Organisation
80 rue d'Arlon, 1040 Bruxelles - +32 2 743 15 90 - www.beuc.eu
EC register for interest representatives: identification number 9505781573-45

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LEARNING FROM THE PAST AND MOVING FORWARD

As far as the European sustainability strategy is concerned, we call for:

- Addressing both the production and the demand side with equal ambition**
- The SCP framework to be considered an **umbrella policy** and be **integrated with other EU policies**
- A **fundamental discussion on economic growth** and its potential to undermine measures to enhance resource efficiency
- The **Commission to take the lead on changing the economic system and thereby the mindsets** of all actors of society
- Concrete and ambitious obligatory targets** to be set for reduced resource use and sustainability alike
- The EU Sustainability strategy, in particular the SCP/SIP Action Plan, to be **based on a set of mixed instruments**, including regulatory measures, market based tools and voluntary initiatives

1. SUSTAINABLE PRODUCTS

1.1 Strengthening the Ecodesign Directive

In view of the revision of the Ecodesign Directive, we call for:

- An **extension of the scope** to non-energy related products
- All relevant environmental impacts** of products to be addressed and for a more systematic approach to be adopted e.g. to chemicals
- A **top-runner approach to be introduced**, i.e. today's benchmarks should become the minimum requirements of future Ecodesign measures
- Favouring legislation** over self-regulation
- Standards to be used for technical issues only**, with no delegation of policy decisions to the ESOs

1.2 Ensuring the Energy Label is a useful tool for consumers

As far as the Energy Label is concerned, we urge:

- The review of the Energy Label foreseen in 2014 to be conducted earlier**, i.e. no later than one year after the entry into force of the new Label
- A survey of consumer perceptions and understanding** of the new layout of the Label to be carried out as a basis to the review process
- The Commission to go back to a closed A-G scale** in case the new layout is found not to be effective in steering up the market towards more efficient products and the greening of consumption

1.3 Dynamic performance requirements: improving the Ecolabel Regulation

In relation to the Ecolabelling scheme, we call for:

- A high level of ambition in the development of product specific criteria ensuring that indeed only the best 10-20% of the products on the market can receive the award
- Improving the decision-making process** of Ecolabel criteria development with the aim of increasing the efficiency and transparency of the scheme
- Establishing a **quality management system** to monitor and control the implementation of the scheme in all EU Member States

1.4 Using labelling intelligently and parsimoniously

With regard to labelling and product information, we stress that:

- The need for labelling should always be **carefully considered** and should not be a substitute for product regulation, which should be given priority
- Labelling and other environmental product information should be **clear, correct, verifiable, relevant** and **harmonised** at the EU level
- Labelling should allow **quick identification of the most sustainable products** and **easy comparison between products**
- Existing **carbon footprint labels** are questionable from a methodological as well as from a consumer comprehensibility perspective. They should not be supported nor promoted by the European Commission and Member States

- Labelling schemes ought to be elaborated **in collaboration with all stakeholders in a democratic process and should not be left to private organisations**
- Third-party verified or compulsory labelling schemes**, such as the EU Energy Label should be favoured
- Labelling/product information should be **combined with other policy instruments**
- Monitoring and enforcement** of labelling schemes need to be ensured

1.5 The need for a legislative framework for the provision of information

Regarding the need for increased coherence between existing labelling schemes, we urge:

- The development of a **legislative framework for the standardised provision of environmental product information**, based on existing European legal instruments (e.g. a legal instrument encompassing existing EU labelling schemes)
- Consistency among existing labelling tools to **take account of international developments at the ISO level**, in particular the ISO 14020 series of standards if improved in the consumer interest
- A **mix of instruments** gathering existing labelling schemes and product policy instruments to form the basis of the European sustainability strategy

1.6 Strengthening the role of Sustainable Public Procurement

With regard to Green Public Procurement, we stress that:

- Authorities play an important role** in leading by example
- Public authorities should continue to **lead efforts to buy and use more sustainable products and services**
- A set of obligatory minimum requirements** to be met by Member States is needed
- The future EU SCP policy should go beyond GPP and **promote Sustainable Public Procurement**

1.7 Ensuring consistency between the various sustainability policy tools

We call for:

- Synergies and increased consistency** to be the aim within the revised SCP/SIP Action Plan
- The European Commission to secure itself sufficient resources** in order to ensure an effective EU sustainability policy

2. SUSTAINABLE CONSUMPTION

2.1 Consumers at the centre of the 7th Environmental Action Programme

The 7th Environmental Action Programme should:

- Place consumers at the centre of the 7th Environmental Action Programme and ensure active involvement of their representatives in the action programme**
- Promote a new global approach linked to more sustainable lifestyles**

2.2 Raising consumer awareness through social marketing campaigns

In order to effectively raise consumer awareness,
the Commission and Member States should:

- Make use of social marketing campaigns** for the good of the environment, using behavioural segmentation techniques and promoting the right messages to the right audience
- Make sure every campaign is combined with other policy instruments** using both 'stick and carrot' to bring about permanent behavioural changes
- Acquire a realistic understanding of consumers** as they actually are, and not as we wish them to be by developing more extensive research towards understanding consumers and their behaviours
- Use this knowledge to better shape and/or test policy interventions and instruments** before their adoption

2.3 Regulating green claims and green washing

With regard to green claims and green washing, we urge the Commission to:

- Acknowledge the **lack of effectiveness of its 2000 Guidelines on Environmental Claims**
- Explore policy routes** to prevent the use of misleading and unreliable green claims and better control green marketing and advertising
- To this aim, consider amending the Unfair Commercial Practices Directive (UCPD) to address green claims or introduce new legislation (based on the model of the health/nutritional food claims directive)

2.4 Promoting choice editing and further involving retailers

With regard to choice editing and the retailers' role in sustainability, we call for:

- The EU product policy to **introduce product roadmaps for elimination of unsustainable products** from the market and to deliver market transformation for priority products
- The **role of retailers to be better underlined and strengthened** in the EU Sustainability policy
- The **Retail Forum to become a true centre of action with clear targets** imposed on retailers. Should retailers not deliver within the given timeframe, the Commission should take actions.
- Retailers to be encouraged to perform choice editing**

2.5 Offering true incentives for getting greener

In order to encourage businesses and consumers to go green, we call for:

- The Commission to **support and coordinate ecological tax policies and reforms** at the national level. The use of market-based instruments ought to be encouraged.
- The Commission and Member States to **reconsider introducing reduced VAT rates for green products** (e.g. Ecolabel products) and services

2.6 Not ignoring the rebound effects

We call for the Commission to:

- Analyse and take account of the rebound effects before developing new policy instruments**
- Explore ways to avoid rebound effects**

3. SUSTAINABLE PRODUCTION

3.1 Sectoral indicators to allow comparisons between companies

With regard to sectoral indicators to allow comparisons between companies, we propose to:

- Foster the development of sectoral reference documents** and ensure they include sector-specific performance indicators and benchmarks
- Establish a working plan** with a list of sectors for which reference documents should be developed
- Make the use of sectoral documents mandatory** in the future Action Plan

3.2 Sustainability and resource efficiency targets still missing

With regard to sustainability and resource efficiency, we advocate for:

- The introduction of specific sustainability targets** in the future SCP Action Plan
- Likewise, **the creation of ambitious obligatory targets and measurable indicators** in order to promote resource saving and eco-innovation
- To this aim, the development of **harmonised methods to measure resource efficiency**

3.3 Harmonised LCA/PCF methodologies

With regard to LCA/PCF methodologies, we advocate for:

- The inclusion of any actions related to LCA or PCF in the revised SCP/SIP Action Plan** in order to ensure consistency among sustainability policy tools
- Address the limitations of LCA and PCF methodologies to be addressed**
- The use LCA and PCF methodology only for comparing system alternatives or providing orientation**; not extended to product labelling
- The use of **significant production or use phase indicators** (e.g. energy efficiency, indoor emissions) **derived from a variety of tools** (e.g. chemical risk assessment) **for product labelling** as these allow for differentiation of similar products compared to LCA indicators.

3.4 Transparency of companies' social responsibility should be enhanced

In view of **consumers' rights to be informed** about how products and services are produced, we call for:

- Initiating a process to **develop comparable corporate key performance indicators**, allowing performance comparisons between companies and the establishment of benchmarks covering all dimensions of sustainability, including a suitable methodology
- Establishing general disclosure obligations for all organisations above a certain size/annual turnover and having business relations based on common key performance indicators.
- In a next step, establish minimum performance requirements for companies based on these key performance indicators.

END.