

The Consumer Voice in Europe

Ref.: BEUC-X-2019-081

10 December 2019

Subject: The consumer mission letter for the environment

Dear Commissioner Sinkevičius,

I wish to congratulate you on your recent appointment as European Commissioner for Environment, Oceans and Fisheries on behalf of BEUC, The European Consumer Organisation.

To support you in this important task, we would like to present our ideas on how to best advance consumers' interests in the area of sustainable consumption and production.

Current shortcomings

A majority of the EU population is concerned about environmental degradation and believes that not enough is being done to reverse this deleterious trend. While the personal readiness to act is increasing, the adoption of more sustainable lifestyles has not been made easy for consumers. They often have to pay more for sustainable products and services; they have no viable alternative to private car usage; they are unable to reduce their exposure to harmful chemicals; they cannot afford passive housing; and they may be misled by greenwashing.

The major failure of the internal market is twofold in this respect. First, the 'polluter pays' principle does not work, as those who pollute less often have to pay more. Second, in the areas of housing, transport, energy, food and non-food production we are stuck with infrastructure that has harmful effects on the environment, and that prevents us from solving the climate crisis.

Our proposals

Give consumers access to greener products and services

Consumer complaints indicate that many of their products that fail early lack durability requirements. For example, in the reporting tool 'Trop Vite Usé/Te Rap Kapot' set up by our Belgian member Test Achats/Test Aankoop¹, the top complaints relate to mobile phones, printers, coffee machines, tablets, laptops, digital cameras, GPS trackers and kitchen blenders. Consumer complaints also indicate that large household appliances such as fridges, washing machines and dishwashers break too quickly.

The EU should take additional action in its future Circular Economy Action Plan 2.0 to ensure that products are sustainable by default, have longer lifetimes, and can be repaired, upgraded, reused and recycled. To this end, we see an urgent need to further develop the EU's regulatory toolbox related to sustainable consumption and production such as Ecodesign, Energy Labelling and the Ecolabel.

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¹ <https://www.test-achats.be/trop-vite-use>

Ecodesign should be extended to cover more consumer products, including the ones that are not energy related. We also call on the Commission to set mandatory requirements to ensure that products are designed to last and to facilitate repair and easy maintenance. Consumers should be able to access information on the expected lifetimes of products and their reparability. We see an urgent need to act on ICT products such as smartphones and tablets, which too often have to be prematurely replaced due to missing or ill-designed software updates.

The EU Ecolabel is an important instrument for increasing consumer information about products of environmental excellence. The Ecolabel has a growing presence within the internal market, as the latest figures on the number of labelled products have shown. The impact of the EU Ecolabel could be increased if the scheme were to cover additional product groups and services, if it were systematically used in green public and corporate procurement, and if it were better advertised to economic operators and consumers alike.

We also support the development of sector-specific strategies to green the supply chain of resource-intensive sectors, such as textiles and furniture, as announced as possible areas of action in the European Green Deal.

Zero pollution ambition

1. Consumers should be able to live in non-toxic environments

Chronic and severe diseases such as cancer, cardiovascular diseases, fertility problems, obesity and allergies are on the rise in the EU². Chemicals are believed to play a causal role in this worrying trend. Still, most chemicals can be used in consumer products with little actual control. Product tests by BEUC members – national consumer organisations – frequently detect chemicals of concern in products that consumers come into very close, regular and prolonged contact with. The long list includes clothes, shoes, toys, childcare products, cosmetics, hygiene products and food packaging. Much of this consumer exposure could be avoided, as these chemicals are found in some but not all tested products, meaning that alternatives are available.

We urgently need new solutions for how the EU can minimise consumers' cumulative exposures to harmful chemicals. The Commission has already acknowledged the need for a long-term strategy for chemicals; solutions must include an integrated policy on chemicals in consumer products, better protection of vulnerable groups, and a response to known policy gaps such as combination effects, endocrine disruptors and nanomaterials. We also look to the Commission to play a much more prominent co-ordination role in the enforcement of EU chemical legislation.

2. The urgent need to further combat plastic pollution, prevent toxic cycles and cut waste

Many consumers are concerned about our throw-away society: too many products fail too early and need to be replaced with new ones, and too many plastic materials are only used once or for a very short period. In combination, these developments have led to an increasing waste problem, both in Europe and globally. We therefore see an urgent need to further reduce the generation of waste, and in particular plastic.

In a circular economy where many more materials will be recycled, there is a risk that we will be locked into never-ending toxic cycles. Many of today's products contain chemicals that were legal when first manufactured but are now either restricted or banned. Increased materials recycling could give these chemicals a second lease on life in consumers' homes. For the circular economy to succeed, consumers must be confident that products made from recycled materials do not contain harmful chemicals that threaten their health.

The EU should further develop its plastics strategy and ensure that consumers are provided with reusable alternatives that are convenient to use in their daily lives. While the previous Commission rightly proposed a restriction of the *intentional* use of microplastics in consumer products – such as in cosmetics – the new Commission urgently needs to tackle *unintentional* releases of microplastics, such as from clothing or car tyres.

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² OECD and European Commission. [Health at a Glance: Europe 2018](#)

3. The urgent need for cleaner air – indoors and outdoors

Exhaust emissions from traffic are a major contributor to lung diseases, and more than 400,000 premature deaths in Europe are linked to air pollution each year³. Car emissions are also directly responsible for healthcare costs amounting to dozens of billions of euros annually and borne by governments and health insurance. The exposure to poor air quality is not limited to pedestrians and cyclists. As our Spanish member OCU recently demonstrated, car drivers are also impacted by air pollution from road traffic as they inhale large quantities of pollutants emitted from vehicles whilst on the road⁴.

Progress has been made over the past few years, notably with the entry into force of the Real Driving Emissions test. The Commission should pursue its efforts and work towards the adoption of Euro 7 standards that cover more pollutants and increase the scope of testing conditions. The reduction of pollutant emissions can also be accelerated by more ambitious CO₂ emissions targets for road transport (which will also advance the electrification of fleets), a broader shift towards more multimodal transport systems, and a consumer-friendly roll-out of electromobility.

In addition to air pollution stemming from industrial production and traffic, consumers are also exposed to many harmful chemicals in the indoor ambient air. Volatile organic compounds are released from construction materials, room decoration and textiles as well as consumer products such as cosmetics and detergents. As pollutants bind to dust, small children in particular are heavily exposed when playing indoors on the ground. This aspect of air pollution should also be addressed in the context of the EU's strategies for the construction, textiles, cosmetics and chemical sectors.

Conformity of products with environmental legislation and its enforcement

The EU adopted new legislation on the market surveillance of products this year that explicitly covers the environmental aspects of products, for instance violations of Ecodesign and labelling requirements.

BEUC calls on you to make active use of the tools provided in this law to facilitate the compliance and enforcement of environmental legislation in the single market. This could be done through more EU-coordinated market surveillance projects covering environmental aspects such as energy efficiency and toxic chemicals. Such an exercise should include mystery shopping on online platforms, in particular with companies that are located outside the EU but sending products directly to EU consumers.

The way forward

I trust that you will have a busy agenda, but hope that you will find the time to meet with us. My colleagues will also reach out to your member of cabinet in charge of consumer policy. I would be very interested in hearing your reaction to our proposals, and would like to tell you more about the experience of European consumers in the area of sustainable consumption and production.

Yours faithfully,

Monique Goyens
Director General

Encl.: An EU that keeps working for consumers – [BEUC proposals for the 2019-2024 European Commission](#)

³ European Environment Agency, *Air Quality in Europe – 2019 report*

⁴ <https://www.ocu.org/organizacion/prensa/notas-de-prensa/2019/calidaddelaware050919>