





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

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## LEARNING FROM THE PAST AND MOVING FORWARD

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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

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### 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

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### 2.1 Consumers at the centre of the 7<sup>th</sup> Environmental Action Programme

The 7<sup>th</sup> Environmental Action Programme should:

- **Place consumers at the centre of the 7<sup>th</sup> 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

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### 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.