



NEW EU ECOLABEL WORK PLAN 2025 - 2029

Initial recommendations by BEUC and EEB

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Summary

The EU Ecolabel scheme is developed jointly by the European Commission and the EU Ecolabelling Board (EUEB) which consists of Member State representatives and stakeholders. The European Environmental Bureau and the European Consumer Organisation BEUC form part of this board. The EUEB discusses the development of the EU Ecolabel and broad action points are agreed in 5-year work plans. The [current EU Ecolabel work plan](#) will be concluded by the end of 2024. In this document, we are suggesting content for the new EU Ecolabel work plan to continue the successful development of the label from 2025 to 2029.

Overview of recommendations

In summary, we recommend the following measures, amongst others, to be included in the work plan:

- The European Commission should commit to the timely revision and expansion of the EU Ecolabel portfolio and invest further resources to do so.
- The EU institutions should commit to procuring EU Ecolabel products in the relevant product groups for their internal use.
- Policymakers should enhance synergies between the EU Ecolabel and relevant EU/national legislation and policy initiatives to foster the uptake of ecolabelled products e.g. during the revision of the Public Procurement Directives
- The EUEB should continue communication and awareness raising efforts to market the EU Ecolabel jointly with Member States, in line with Article 12 of the EU Ecolabel Regulation.
- Besides, the EUEB could explore the following strategic activities to support the development of the EU Ecolabel:
 - Map and explain how reporting duties under certain legislations may be met more easily for EU Ecolabel license holders thanks to the documentation already available via the EU Ecolabel application, e.g. in relation to the CSRD, CSDDD, or SDGs.
 - Assess and promote the specific environmental savings that are generated through the use of certified products compared to conventional ones, e.g. in terms of avoided greenhouse gas emissions, or avoided use of harmful substances.
 - Follow the announced revision of the Public Procurement Directive and how the use of ecolabels in public tenders can be facilitated.
 - Develop guidance on how the EU Ecolabel can be supported through financial measures like VAT exemptions or ecomodulation of Extended Producer Responsibility fees.
 - Investigate how the administrative procedure for certification could be simplified.
 - Continue improving the electronic catalogue of all certified products (ECAT) to ensure it contains complete data from all EU Ecolabel products, services and license holders.

Our recommendations are elaborated further throughout the document.

1. How the European Commission could strengthen the EU Ecolabel further

1.1. Official commitment to strengthen and grow the EU Ecolabel

The EU Ecolabel has proven its success as a tool for fostering sustainable production and consumption. In the past years, the scheme has significantly increased its uptake in terms of number of license holders and certified products. Moreover, several initiatives of the Green Deal have linked to the EU Ecolabel and recognised its frontrunner role, e.g. through the synergies foreseen between the EU Ecolabel and the development of ecodesign measures to be established in delegated acts.

The Commission should continue to recognise the importance of the EU Ecolabel in several ways. Firstly, the portfolio of the EU Ecolabel needs to be well maintained, including through **timely revisions of the existing product groups**. And ideally, it should **further expand the EU Ecolabel's portfolio**. While it is important to be mindful of resources and choose potential new product groups carefully, there are certainly new areas where the EU Ecolabel could be successful. It should be considered which opportunities emerging business models in the context of the circular economy can offer to the EU Ecolabel (e.g. leasing, remanufacturing, sharing, etc.). Other ISO Type 1 ecolabels in the EU are setting criteria in this direction (e.g. textiles rental or car sharing).

In previous work plans, there had been the **commitment to expand the EU Ecolabel by several product groups within the coming years**. A similar commitment could be made again. A wider product offer would even better reflect the important role the EU Ecolabel plays in contributing to achieving the EU's Green Deal objectives. If there is sufficient interest, it could be helpful to revive the former working group on enhanced collaboration between ecolabels. This could help identify synergies between the EU Ecolabel and other Type I ecolabels, and potentially save resources on new criteria development in cases where requirements from another scheme could be directly adopted under the EU Ecolabel.

A second way to impactfully support the EU Ecolabel would be **for the EU institutions to commit to procuring EU Ecolabel products for their internal demand** in the relevant product groups. Germany for example had [committed](#) in their sustainability strategy 2018 to buy 95% ecolabelled paper with the Blue Angel for their public federal administration authorities by 2020 (an objective that was met).

A third way could be for the EU to **set a target to increase the market share of ecological products** to a certain percentage by a given year. Germany has committed to increasing the market share of products with a public ecolabel (Blue Angel, organic label, energy label in highest class) to 34% by 2030, an objective anchored in the government's [sustainability strategy](#).

1.2. Strengthen the uptake of the EU Ecolabel through Green Public Procurement

Public Procurement can be an important lever for ecological products if the large volume of public expenditure (accounting for 14% of the EU's GDP) is tied to green criteria. Green Public Procurement is therefore an area that continues to be important to stimulate the uptake of the EU Ecolabel.

Referring to ecolabels in a tender can save resources while creating demand for ecolabelled products. Procurers then do not have to formulate the green tender requirements from scratch and can tie the verification to the presence of an established ecolabel. However,

procurers currently face certain regulatory challenges and legal uncertainties when doing so (such as the link to the subject matter).

Ursula von der Leyen has [announced](#) a **revision of the Public Procurement Directive** for the new mandate. During the revision of the directive, it should be ensured that the **reference to ecolabels in green public tenders is encouraged and facilitated**. That way, the EU Ecolabel could be more easily integrated into public tenders in the future. Ideally, mandatory GPP targets should be set. This would eventually foster the demand for EU Ecolabel products.

1.3. Synergies between the EU Ecolabel and existing & new legislation

The EU Ecolabel could successfully be integrated in relevant EU policies during the past years, such as the Ecodesign for Sustainable Products Regulation, the Empowering Consumers for the Green Transition Directive and the Green Claims Directive (pending negotiations). This creates synergies between policies and boosts the attractiveness of the EU Ecolabel for businesses. New proposals will be made during the coming years where references to the EU Ecolabel could be crucial. Policymakers, both at EU and national level, should **create strategic links between the EU Ecolabel and new legislation** where possible.

2. How the EU Ecolabelling Board could develop the EU Ecolabel through strategic activities

2.1. Continue to support the uptake of the EU Ecolabel through strategic communication efforts

The current work plan emphasizes **increased communication and awareness-raising efforts** to promote the EU Ecolabel. Many measures have been successfully implemented in the past years: there is a multi-annual communication plan in place, regular meetings of the Communication Task Force with at least one colleague from each EUEB member participating, a joint communication calendar and first communication actions have been implemented jointly across EUEB members. We welcome this development, which has proven successful in increasing awareness of the EU Ecolabel and uptake among companies.

We recommend continuing these efforts, as is also foreseen in the multi-annual communication plan. At the last Task Force meeting on 17 October 2024, many members expressed interest in carrying out further joint activities. More joint social media campaigns or online events should be planned together with the Task Force. Actions which each member should be able to implement relatively easily in their country or via their channels. World Ecolabel Day would be a good annual hook to plan a common activity. Online webinars about the EU Ecolabel can be interesting for audiences across Europe and should be organised and promoted by all EUEB members. This could cover targeted webinars for each of the sectors where EU Ecolabel products and services exist, but also for retailers, public procurers, or policy makers.

All members of the EU Ecolabelling Board, Member States and stakeholders, should contribute to these efforts and use their channels to circulate campaigns, event invitations etc. to reach a wide audience.

2.2. Promote the links between the EU Ecolabel & Green Deal policies to attract new license holders

The current work plan has the objective to strategically integrate the EU Ecolabel in EU policies on circular economy and sustainable consumption. This objective has been achieved, with several important files having referred to the EU Ecolabel such as the Ecodesign for Sustainable Products Regulation, the Empowering Consumers for the Green Transition Directive and the Green Claims Directive (pending negotiations). These **new policies should be communicated to potential license holders to highlight the additional benefit** of automatically complying with upcoming rules by certifying with the EU Ecolabel. This important hook should be leveraged further in the coming years, e.g. through webinars and information material.

2.3. Promote further links between the EU Ecolabel and legal / reporting requirements

There are further policies and initiatives which do not explicitly mention the EU Ecolabel but that can be relevant, nevertheless. It could be interesting to **explore in detail how the EU Ecolabel criteria might interact with existing reporting and further requirements**, for example the Corporate Sustainable Reporting Directive, the Corporate Due Diligence Directive, the EU Deforestation Regulation, the Textile Labelling Directive, or the Sustainable Development Goals.

This could require an extensive mapping exercise to understand how these policies overlap with aspects the EU Ecolabel covers. The results could be used to highlight to existing license holders and potential applicants how the investment into the EU Ecolabel also pays off in terms of compliance with mandatory reporting requirements, or in terms of sustainability communication.

For example, the process of complying with the EU Ecolabel requirements could help a company to already have all the necessary documentation available to report on certain points under the CSRD. Or the improvements the company achieved thanks to the EU Ecolabel could be communicated to their stakeholders in terms of contribution to the SDGs in their sustainability reporting.

2.4. Calculate the concrete environmental savings achieved through the EU Ecolabel

Concrete numbers of how the EU Ecolabel reduces the environmental footprint of products and services can be a more powerful message than the general statement that it does help the environment. Several labels (e.g. [Nordic Swan and Green Crane](#)) have started calculating and communicating how the use of their certified product or service compares to a conventional one, for example in terms of reduced emissions of harmful volatile organic compounds or avoided greenhouse gas emissions. The EUEB could initiate a similar development to calculate and **promote the specific environmental savings that can be generated with the EU Ecolabel** (in selected product groups and selected environmental impacts).

2.5. Develop guidance on financial support measures

The Ecodesign for Sustainable Products Regulation sets in Article 64 that **Member States may adopt measures to incentivise products covered by a delegated act under the ESPR**. It specifically mentions that these measures should target products in the two highest performance classes or products certified with the EU Ecolabel. This presents the opportunity for Member States to develop financial support measures supporting EU Ecolabel products.

It could be inspiring for Member States if the EUEB could develop examples of potential measures that can support the uptake of EU Ecolabel products. Ideas that have already been part of the previous work plan could be considered, such as a VAT exemption, or a reduction of the Extended Producer Responsibility fee for EU Ecolabel products. Some Member States have mentioned their experience with applying these measures in their countries during the EU Ecolabelling Board. **National examples could be assembled into a guidance document.**

2.6. Efficient administrative processes

The certification process can be a hurdle for some interested applicants who do not immediately manage to handle the criteria and the application in their complexity. We recommend **investigating how the administrative process could be simplified**. It could be interesting to hear from Competent Bodies with a well-established **digital application platform** and explore the possibility of establishing the same system for all/a group of Competent Bodies.

For example, Nordic Ecolabelling uses a tailor-made digital portal to make the certification process with the Nordic Swan and EU Ecolabel a smooth experience for applicants and certifiers alike. Their experience had been shared with members of the Global Ecolabelling Network along with an invitation to other ecolabels to take inspiration from their digital infrastructure or even to use the same one.

The **completion of the electronic catalogue ECAT should be continued** with the aim of integrating all EU Ecolabel products, services and license holders with the complete associated data as soon as possible. The latest status presented at the EU Ecolabelling Board on 18 April 2024 showed that so far, 87% of licenses and 69% of products are included in ECAT. Thus, the information is still incomplete, and even for the products already listed, the EAN number is still missing in many cases. This means, many EU Ecolabel products can still not be easily identified, and online platforms cannot retrieve the information from ECAT to be displayed on their website.



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