UNEP

Training Handbook
Eco-labelling: What it is & How to do it

UNEP/EC Project 'Enabling developing countries to seize eco-label opportunities – Capacity building and technical assistance for industries and governments in developing economies'

inWent
Capacity Building International Germany

The project is carried out with funding from the European Union and the Federal Ministry for Economic Cooperation and Development (Germany)

In cooperation with InWEnt

Training Handbook

Foreword

This training handbook 'Eco-labelling: what it is and how to do it' contains all the necessary information needed to understand the concept of eco-labelling, and more specifically, the institutional and operational setup of the European Eco-label. The handbook addresses issues such as:

- Why and how eco-labels can contribute to environmental efficiency;
- How the eco-label is applied to product groups at hand in the project;
- The technological requirements needed to obtain the EU Flower certification;
- The successful marketing of products once eco-label certification obtained; and
- The role of government and civil society organizations in promoting and increasing the effectiveness of eco-labels.

The handbook is specifically designed for industry, government and other stakeholders interested not only in improving their understanding on these issues, but also to be able to prepare and deliver similar trainings in their own countries, adapted to the specifics and context of their own situations.

The training handbook is the result of the fruitful work completed by a team of international experts who cooperated under the auspices of the UNEP/EC project "Enabling developing countries to seize the eco-labelling opportunities". The idea of the project has emerged from the strong interest and realization of the need for a comprehensive economy-wide drive towards sustainability of natural capital, the decoupling of economic activity from negative environmental impacts through resource efficiency, and sustainable consumption and production approaches.

Eco-labels are market-based instruments that are actually gaining more support at the policy level, such as the compulsory introduction of eco-labels in France for motor vehicles (June 2009) and homes (from July 2009), and are becoming increasingly more attractive for businesses. The recent move of the world's largest retailer, Wal-Mart, to label its suppliers based on the environmental and social impacts of each of their products, is another significant sign of the relevance of this handbook for businesses worldwide.

The Sustainable Consumption and Production Branch of the UNEP Division of Technology, Industry and Economics, has contributed to the knowledge and experience on the constantly evolving concept of SCP and integrated resource management. InWEnt is a capacity-building institution with over 20 years of experience in training specialists from developing countries in environmental management. Together with their combined expertise, the two organisations are demonstrating through this hands-on project how the eco-label can contribute to sustainable development in emerging and developing economies.

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1 Introduction

1.1 Enabling Developing Countries to Seize Eco-label Opportunities

1.1.1 Introduction to the Project

The Project

Enabling Developing Countries to Seize Eco-label Opportunities is a project being implemented by United National Environmental Programme (UNEP), InWEnt- Capacity Building International (InWEnt) and other partner organizations.

The UNEP division involved is The Sustainable Consumption and Production Branch of the Division of Technology, Industry and Economics (UNEP/DTIE).

Project Objectives

The overall objective of the project is to increase the environmental efficiency of key export products and related industrial processes in target countries

More specifically, it aims at increasing the number of products from target countries eco-labelled with the EU Eco-label, the eco-label selected for this project, in domestic, European and global markets.

By the end of the project, it is expected to have on the ground results including a number of export products awarded with an EU Eco-label or other European countries eco-label or in the process of being so.

Product groups identified by local partners are **textiles** (India and South Africa), **footwear** (Mexico and Kenya), **paper** (Brazil) and **televisions** (China).

Moreover, the project aims at developing a roadmap in the direction of mutual recognition between eco-labelling schemes and increasing the cooperation among developed and developing countries. This should contribute to increasing reliability of eco-labels as a marketing instrument and support efforts towards the simplification of the 'eco-labelling universe', which will eventually benefit both producers and consumers.

Project Sponsors

The project is co-funded by the European Commission and the Federal Ministry for Economic Cooperation and Development (Germany).

Project Partner Organizations

Partner organizations and associates in the project include:

- the Foreign Trade Secretariat, Ministry of Development, Industry and Foreign Trade (SECEX) in Brazil
- the Sino-Japan Friendship Environmental Protection Centre (EDC) in China
- the Consumer Unit & Trust Society (CUTS) in India
- the National Cleaner Production Centre (KNCPC) in Kenya
- the National Institute for Standards and Certification (INMC) in Mexico
- the Council for Scientific and Industrial Research (CSIR) through its National Cleaner Production Centre (SA NCPC) in South Africa
- the German Federal Environmental Agency (UBA) and
- the Global Eco-labelling Network (GEN).

Project Timetable

The project duration is 4 years and it is expected to end in May 2011.

1.1.2 Rationale for the Project

Demand for Tools Identified

The Marrakesh process is a forum for action on sustainable consumption and production at regional and national level led by the United Nations Environment Programme and United Nations Department of Economic and Social Affairs to develop and implement strategies on Sustainable Consumption and Production. The process is a response to the call of the WSSD Johannesburg Plan of Implementation to develop and support national and regional initiatives that contribute to the decoupling of economic growth from environmental degradation and transition to sustainable economies. The 10-year Framework of Programmes on Sustainable Consumption and Production developed by the Marrakesh Process[1] has revealed the demand for tools and capacity-building at all levels. The project responds to these needs by promoting eco-labelling as one of the product information tools and providing capacity-building and technical assistance to industry, government and civil society stakeholders to foster their use.

Need for Information on Eco-label tools

Eco-labels represent voluntary, participatory, market-based economic instruments that provide reliable information about environmental credentials of goods and services.

Small-and-medium sized enterprises in emerging economies need more and better information about technical standards and marketing requirements in various export countries to meet eco-label requirements.

Governments and civil society organizations need to understand, which policies and tools support and promote the use of eco-labelling within the SCP framework.

Consumers both individual and institutional should become more aware about hidden impacts of goods and services to make their informed choices thus providing market pull for behavioural change at all levels.

Opportunity to Leverage on Trade to achieve Sustainable Development

In changing consumption and production patterns, trade has a crucial role. The international debate on trade and the environment has in recent years moved towards seizing the synergies between the two, making trade an engine of sustainable development and thus the achievement of the Millennium Development Goals (MDGs). This is stated both by the Doha Ministerial Declaration (DMD) of the World Trade Organization and the JPoI.

By focusing on the European eco-label, the project aims at levering on trade and specifically on developed countries demand for environmentally friendly goods to promote the environmental efficiency of key exports thus allowing their industries, including the Small and Medium Enterprises (SMEs), to benefit economically and socially from the increased market opportunities while preserving the quality of the environment and enhancing sustainable use of natural resources.

1.1.3 The Five Project Stages

Stage One: Background Studies

The project follows five main stages of implementation. The first one was dedicated to background studies of eco-labelling diffusion, market penetration possibilities and related policy framework and to assessment of needs and barriers for further diffusion of eco-labels in target countries. This stage also laid firm foundation for the project's implementation by raising awareness about eco-

[1] The Marrakesh process is a programme of activities led by the United Nations Environment Programme and UN Department of Economic and Social Affairs to develop and implement strategies on Sustainable Consumption and Production. The process is a response to the call of the WSSD Johannesburg Plan of Implementation to develop and support national and regional initiatives that contribute to the decoupling of economic growth from environmental degradation and transition to the sustainable economies

labelling opportunities in target countries, building the networks of relevant actors, establishing multi-stakeholder dialogues among them.

Stage Two: Capacity Building

The current second stage is on capacity-building when national experts trained on eco-labelling concept, necessary policy frameworks and technical and procedural requirements for obtaining the European eco-label and marketing strategies for eco-labelled products will adapt the training to the context and specifics of their respective countries and industries and replicate the training in their home countries. Both global and national trainings are designed for decision-makers and technical experts from industry, design sector and governments.

Stage Three: Technical Assistance

Based on the outcomes of the capacity-building, national experts jointly with UNEP and international trainers will be working with interested governments and industry enterprises in the technical assistance phase of the project. Technical assistance programmes will be developed for three companies in each target country/sub-region, selected on the basis of the best brief business plans submitted by companies after the national training. The plan should outline how to proceed with eco-labelling of their products, showing environmental benefits from labelling, new market opportunities and associated efforts to improve the social impacts of products, including the company's Corporate Social Responsibility.

National experts jointly with UNEP and international trainers will provide special assistance to companies on the investments (in terms of technology, finance and skills) requirements to comply with the environmental criteria and on the procedural steps necessary to obtain eco-label awards. They will also work with companies' industrial designers on the environmental and technical requirements of products and technologies for obtaining the eco-label and with marketing managers to design and implement successful marketing campaigns for wider market penetration at national/sub-regional and global level.

At the same time, government decision-makers interested in promoting eco-labels at the policy level will submit brief policy programme. UNEP together with national and international experts will be providing technical assistance to the governments' policy development efforts trying to maximize the synergies with the eco-labelling process implemented with the respective industry representatives.

Stage Four: Roadmap for Mutual Recognition

In parallel to other project work streams, the *Roadmap towards mutual recognition of eco-labelling schemes* will be developed. Benefiting from and building on the activities already carried out by the Global Eco-labelling Network (GEN) to develop and promote a GEN International Coordinated Eco-labelling System (GENICES) this will be based on an assessment of opportunities and barriers and will include a list of focused and practical recommendations for increasing the cooperation between different eco-labelling bodies illustrating the potential for cooperation and possible approaches. The Roadmap will moreover contain lessons learnt that will emerge from the analysis and the comparison of several schemes that might be useful to improve the present EU Eco-label and other European schemes. It will be distributed to the relevant labelling bodies in the target countries/sub-region and in Europe.

Stage Five: Disseminating Project Results

The final stage of the project will focus on dissemination of project results. Industry, governmental and civil-society stakeholders from the target countries/sub-region and from the neighbour countries will be invited to regional conferences in order to raise their awareness and evaluate the possibility of replicating the experience. Relevant European importers of the product groups having obtained/in the process of being awarded the EU Eco-label or another

European eco-label will be invited to continue the dialogue, show them the project results and explore the possibility of developing commercial partnerships with the companies with the eco-labelled products. Relevant representatives of European eco-labelling bodies will also attend to discuss possible improvements of their schemes, benefiting from the lessons learned from the project.

1.2 Train-the-Trainers Workshop

Objectives of the Training

The Train-the-Trainers workshop, "**Eco-labelling: What it is and How to do it**", is a key activity of the project that sets the stage for capacity-building and technical assistance phase.

The objectives of the training are to:

- improve understanding of the concept of eco-labelling, its rationale, policy and operational set-up and key factors for its effectiveness on the example of the EU eco-label
- enable stakeholders in the target countries to assess the technical adaptation required by industries to meet eco-label criteria for textile, footwear, pulp/paper and television
- assist companies in the target countries to handle the application process for European Union (EU) flower eco-label certification and successfully market such products
- assist government representatives in the target countries to promote eco-labels with specific supporting policies.

The training is designed for industry and government representatives of the project target countries (China, India, Kenya, South Africa, Brazil and Mexico).

Participant Introduction Exercise

Purpose

To introduce the participants to the group.

To begin working interactively and in the mind-set for Train-the-Trainers.

Instructions

1. Pair up with someone you have not met before.
2. Have a conversation with them to find out the following information so you can introduce them to the group.

You will have 10 minutes, so take about five minutes each.

Information for Introduction

About the person

- What is your partner's name?
- What would they like to be called?
- What is the correct pronunciation for their name?
- What organization does your partner come from or represent?
- What does that organization do?
- What is their role in that organization?

About Eco-labelling

What does your partner think could be the most important benefit of Eco-labelling in their country?

What do they think will be the biggest challenge to get uptake of Eco-labelling in their country?

Introductions

Each participant is to introduce their partner (we will take about 15-20 minutes to complete this)

The facilitator will record answers to the questions about eco-labelling on flip charts.

Key and Common Benefits and Challenges

The facilitator will overview and summarise the answers about benefits and challenges.

Brief group observations/comments on key/common benefits and challenges (2-3 mins).

The Train-the-Trainer Mind Set

Questions for whole group discussion (5 mins).

- How did you obtain the information (open/closed questions, follow-up questions)?
- Did you record the answers, how did you do that?
- Did you need to clarify anything, how did you do that?

- Did you pass on accurate information?

Key Questions for the Course

Participant should ask these questions throughout the workshop.

- Have I understood the information presented?
- Could I explain it to someone else?

If the answer is “no” or “unsure” PLEASE stop the presenter and ask for clarification.

Further questions to consider during the workshop.

- How would I explain the information presented to someone else?
- What would help me to explain this information?

Questions at the End of Each Module

At the end of each module the trainers will ask you to consider some questions about the module to help you think about how you might replicate or adapt the materials in that module. This will help you to be prepared for the work we will be doing on Thursday to develop your own work plan to deliver the training in your own country.

Questions:

- What do you think are the key issues in this module?
- Which topics had too little time?
- Which topics had too much time?
- Which topics could have been learnt in another and more fruitful way?
- What will you underline to yourself to remember when you have to do the training?
- Is there anything you need to change to apply this module to your national context?
- How will you develop your own approach to delivering the training?
- Where do you need further support?

Programme for the Training

The training programme over the four days is based on four modules as follows:

- **Day One**: Module A Introduction to Eco-labelling and the EU Eco-label
- **Day Two:** Module B Textiles, Footwear, Televisions and Paper Product Categories (in four separate groups)
- **Day Three**: Module C Marketing Eco-labelled Products and

  Module D The Role of Governments and Consumer Organizations in Promoting Eco-labelled Products
- **Day Four**: Module D continues in Group and individual work to develop your own training plans

There are three organised evening events:

- Welcome reception on Monday night
- Practical exercise on Tuesday night
- Farewell Dinner on Thursday night

The overall programme for the training is included in the Training Handbook. For each module, the trainer will set out an agenda at the start of their presentations.

The Presenters

Module A:

- John Polak, Christian Loewe and Ben Casper

Module B:

- Textiles: Lisbeth Frisenborg
- Footwear: Sandro Milanese
- Televisions: Anna Esteve
- Paper: Nicholas Paxevanos

Module C:

- Ernst Leitner and Martin Lichtl

Module D

- Christian Loewe

Introductions to the trainers are included in the Training Handbook.

The Training Materials

The main training material for the Train-the-Trainer workshop is this Training Handbook. It includes notes for each of the modules and resource materials that are needed during the training.

There is also a Trainer's Kit. This includes some guidance about how to run training programmes and in particular how to replicate (and adapt) the modules presented in this Train-the-Trainer workshop in your home countries. The Kit includes the PowerPoint presentations with explanatory notes.

All the training materials will also be provided in electronic form so you can adapt them as needed.

Training Evaluation

UNEP, InWEnt and the trainers are keen to have feedback from you about this course as part of the evaluation of the training.

There is a form at the end of the notes in this Training Handbook for you to complete at the end of the training.

2 Module A: Introduction to Eco-labelling and the EU Eco-label

2.1 Introduction

Objectives

Participants will:

- become familiar with the concept, philosophy and principles of eco-labelling
- understand type I eco-labels and the relevant International Organization for Standardization (ISO) standards
- know about the main eco-labels world-wide and in particular in Europe
- understand the life-cycle-approach to eco-labelling
- understand the EU eco-label scheme
- understand the relationship between the EU eco-label scheme and European Union policy, including the EU Sustainable Consumption and Production (SCP) Action Plan
- understand how to establish new eco-label schemes.

Programme

- Environmental information systems and the theory of eco-labelling
- Standards and Eco-labelling
- EU Policy on SCP and the EU eco-label
- EU eco-label
- Mutual recognition and collaboration
- Designing and launching new eco-labels

2.2 Environmental Information Systems and Theory of Eco-labelling

2.2.1 Environmental Information Systems

Introduction

Environmental Information refers to any limited or detailed information on the environmental attributes or performance of products, services, or facilities. This can take many forms, including written claims or declarations, tables or matrices, and labels or logos. The information can appear in annual reports, newspaper, radio or television ads, in catalogues, or on products.

When one speak of Eco-labels, it is typically in association with products or services, and the Eco-labels usually appear on the product packaging or in any reference material (e.g. websites, catalogues).

Environmental Labels

Introduction

In the 1990s, the International Organization for Standardization (ISO) developed a series of guidance standards (as opposed to certification standards) related to environmental labels.

- ISO 14020 – all types of environmental labels.
- ISO 14021 – Type II - self declared environmental labels (often a single attribute, sometimes a company's own environmental logo).
- ISO 14024 – Type I – environmental labels (environmental leadership – almost always a third party's logo)

- ISO 14025 – Type III – environmental declarations (detailed information – usually a matrix)

Of course there are many other “Types” of labels already in the marketplace and more yet that are possible. Some obvious examples are organic labels and energy labels. As well, much of the public does not easily distinguish environmental labels from labels designed more for social causes, such as “fair trade” and “child labour free” labels.

Goal of Environmental Labels

As has been identified by the International Organization for Standardization (ISO), the overall goal of environmental labels and declarations is:

"...*through communication of verifiable and accurate information, that is not misleading, on environmental aspects of products and services, to encourage the demand for and supply of those products and services that cause less stress on the environment, thereby stimulating the potential for market-driven continuous environmental improvement*".
In order to develop and operate a successful Eco-labelling system, one should be aware of how Eco-labels are viewed from different perspectives.

Government Perspective

Policy Tools

Governments typically use three different types of policy tools:
- **regulatory instruments** – these create a level playing field, are expensive and time consuming to develop, and are often politically charged. Enforcement (implementation) is similarly expensive. They, in effect, work by forcing *behaviour change*.
- **economic instruments** range from direct grants to targeted subsidies and tax incentives. Cost is a primary issue, but they can generate behaviour change in a timely fashion, albeit, probably unevenly as uptake is not always uniform. In effect, they work by *buying behaviour change*.
- **education and information tools**: There are costs involved with this type of approach, but if properly undertaken can generate long term, and often intergenerational benefits (eg the recycling efforts in many areas). In effect, they work by encouraging or *persuading behaviour change*.

Combined approaches can often also be used.

Labels as Market-based Tools

Governments often view environmental labels as market-based policy tools (but also serve as a form of environmental credential) that has characteristics common to all three of the above categories.
More specifically, environmental labels:
- work on the basis of informing buyers (private and institutional) about the environmental attributes of the related product or service, thus encouraging or persuading behaviour change;
- have the potential to deliver economic benefits to those companies that effectively market on environmental grounds, thus, in effect, buying behaviour change; and
- cause companies losing market share (because of lack of credible environmental credentials) to improve their products, thus, in effect, forcing behaviour change.

For Eco-labels, changes in buying habits are what deliver the benefits.

Policy Tool Kit

When considering the management of any specific issue or issues, the four policy instruments (regulatory, economic, informational and market-based) should be considered as strategic tools in a tool-kit. While each has its costs and benefits, they operate in different ways, and can be considered for application either alone or in concert with other tools.

Should regulatory action be envisioned as a probability within a five to ten year

time frame for an issue of concern, but where the science may not yet be fully conclusive, other tools can be applied earlier. This is perhaps a good example of how governments could not only follow the “precautionary principle”, but bundle approaches together in a multi-year strategy (ie information initiatives, followed by Eco-labels, before regulation is implemented).

This kind of pre-regulatory approach has the potential to create sufficiently positive effects and marketplace changes to avoid the development and implementation of expensive and time consuming regulations. However, balance is absolutely necessary. Care must be exercised to avoid the creation of unnecessary market barriers when the science is less than directionally supportive.

Private Sector Perspective

Introduction

Different kinds of environmental information systems are being used by companies to promote their products. The objective is to encourage consumers to buy the products for their environmental attributes.

As well, Eco-labels can serve as a form of environmental credential that can be used in promoting the company, as well as the product. In this type of application, environmental labels are marketing or sales tools. They work in concert with the usual purchasing decision issues of price and quality (including performance, durability, and other features that relate to appearance, status etc.)

Two of the main elements of any type of product related marketing strategy are:
- assessing the target audience for the marketing efforts
- getting the message right

Target Audience

There is no standard target audience. However, the purpose of identifying the target audience is to determine its main likes, dislikes, orientation, and any possible predisposition. This in turn helps to better craft the message. In terms of environmental marketing, the kinds of things that should be reviewed in terms of target audience include the likely age grouping for the product category, this group’s environmental orientation in terms of knowledge, interest and probability to be swayed by environmental messaging.

Right Message

Once the target audience is adequately identified, the next step in the strategy is to develop the right message. Here, consideration needs to be given to whether the messaging aims to:
- inform the audience about the environmental aspects of the product; or
- identify that the product has environmental leadership characteristics relative to competing products.

Marketing Principles

Regardless of the decision, the following principles are useful guides:

(1) be cautious about highlighting one environmental attribute, while ignoring other potentially more significant environmental attributes.
(2) Ensure that any claims are, as a minimum, verifiable. Often the best approach is to have an independent party verify claims.
(3) Avoid any claim that is non-specific or vague. A term such as “natural” or “chemical-free” can be both true, and false depending on interpretation and context.
(4) Ensure that claims are relevant. Claiming that your home ink-jet printer is free of DDT is technically correct, but there are no printers made with DDT.
(5) Similar to the first principle, avoid promoting the environmental aspects of a product that is, by definition, harmful to the environment, just a bit less so than competing products. A company’s cigarettes will not be considered

green just because they use less packaging, and have lower levels of tar and nicotine.

(6) Be truthful.

Life Cycle Assessment and Eco-labels

Life Cycle Thinking

Full and formal life cycle assessment is seldom used in Eco-labelling programs. However, a variant thereof, “life cycle thinking” or life cycle considerations, is in more common use. Life cycle thinking involves consideration of all relevant environmental aspects of a product over its entire life cycle, with the aim being to identify the most significant environmental parameters of a product.

There are various analytical tools available. Most well known are Life Cycle Assessment (LCA) and the matrix tools such as the Life Cycle Thinking (LCT) matrix, among others. The former is a comprehensive tool; however, it takes much effort and time to implement. The latter is simple to use; however, it lacks vigor in analysis.

LCT Matrix

The following table shows an example of an LCT matrix.

Life Cycle Thinking Matrix

Life cycle → **Environmental aspect↓**	**Use of raw materials**	**Manufac-turing**	**Distri-bution**	**Use**	**End of life**
Raw material and energy consumption					
Emissions to air, water and soil					
Physical pollution					
Waste material					
Reuse, recycling and recovery of material and energy					
Total					

Using the LCT Matrix

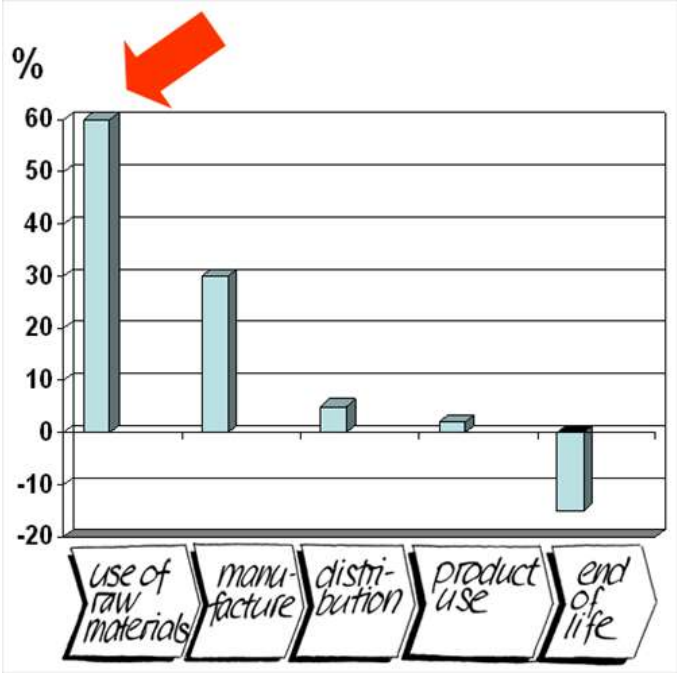
Once all of the relevant environmental parameters with values are collected and the cells of the matrix filled in, their values need to be converted into values with common units such as CO_2 equivalents. The purpose of the conversion is to calculate the relative contribution of each environmental parameter to the total product. This calculation can only be made when all values of the environmental parameters in the LCT matrix are expressed in the same units. The conversion simply involves the multiplication of the environmental parameter values in each cell by the corresponding energy or CO_2 equivalents. Dividing the CO_2 equivalent value of each environmental parameter by the total CO_2 equivalent value of the product gives the relative contribution of each environmental parameter. By comparing the magnitude of each parameter’s relative contribution, the significant environmental parameters can be identified. Similarly, the most significant environmental aspects and life cycle stages can be identified.

In Eco-labelling, the objective is to develop criteria for those parameters or attributes that allow for the differentiation of products. The normalization of the key attributes is critical in determining the level of selectivity or leadership (ie 20%).

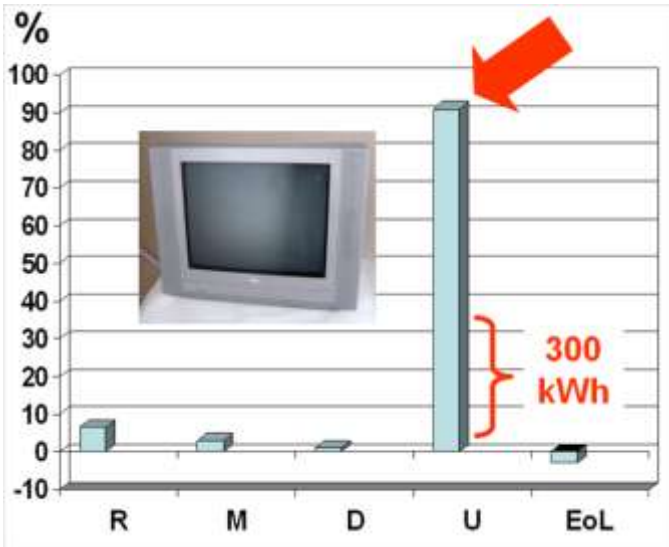
Exercise

The following examples can serve as a basis for discussion on the application of LCT (taken from the book “ECODESIGN – the competitive advantage”, Wimmer, Lee, Quella & Polak – to be published by Springer in late 2009)

The first is an example of a resource intensive environmental profile. Can you determine what kinds of products would best fit this profile?



While the second example is for a television set, can you determine what other products might fit this kind of environmental profile?



2.2.2 Theory of Type I Eco-labels

Purpose of Eco-labelling

The purpose of Eco-labelling (Type I) is to create market advantage for environmentally preferable products. The desired outcome is to have those preferable products displace products with lesser environmental performance. The losers in this process will either disappear from the marketplace over time or find ways to improve their environmental performance in order to regain market share. This displacement and improvement process is what delivers environmental improvement and Eco-labels are used to demonstrate that the carrier product is an environmentally preferable product.

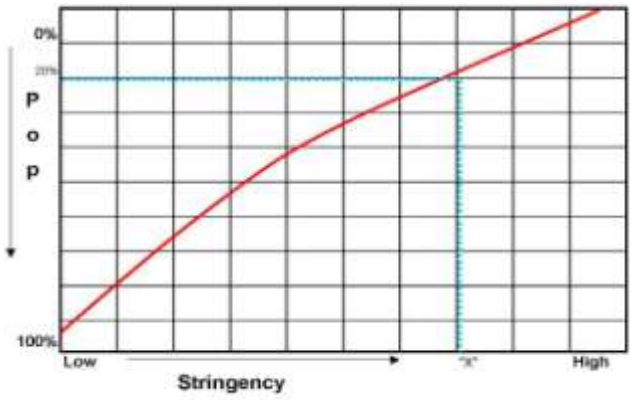
Criteria Development – Stringency

The establishment of criteria in the process of Eco-labelling is a fundamental element in the creation of environmental benefit. The level of environmental stringency chosen should be such that about 20% of the population will be immediately able to meet the criteria.

Notional Relationship between Stringency and Population

Graphic 1 shows the notional relationship between population percentage and environmental stringency.

GRAPHIC 1: STRINGENCY AND POPULATION



The vertical axis shows the percentage population (Pop) of products in the sector of interest that could meet the Eco-labelling criteria, and the horizontal axis shows the relative level of stringency. As the graph shows, when the stringency approaches the high end (ie to the right) less and less products can meet the criteria, until at the highest stringency, no product can (ie 0%), As the stringency level is decreased (going to the left on the horizontal axis), more and more products are able to meet the requirements, until, at the lowest possible level of stringency, all (ie 100%) of the products can meet the critera.

At the point where the population is about 20%, a horizontal line can be drawn to the right and then downward at the point of intersection with the curved line to determine the stringency level ("X") that is appropriate for the Eco-labelling criteria.

The word "notional" is used to describe this relationship because the graphic is a simplification of the relationship between all of the factors involved in determining overall environmental performance. The environmental differentiation between products can be complex, and may require the aggregation of different environmental attributes at different stages of the product's life cycle. Collapsing this down to a manageable level normally requires the application of life cycle science and the weighting of attributes.

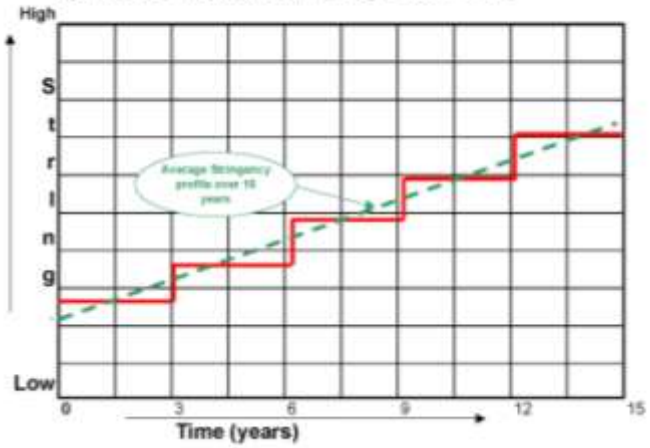
Because of the complexity, this can be a difficult curve to define. However, to provide a simple example, if we assume that recycled content is the major

differentiating factor for a particular product category, then we could replace relative stringency with recycled content, and add the range typically found in that sector. For the example of paper products we could insert the range 0% to 100%, for the low to high stringency. If the above curve was correct, then the Eco-label criteria for the paper product in question would be about 70% recycled content.

Progression of Stringency

Once the initial stringency is set, it remains at that level until a review determines that a considerably higher proportion of the population of those products are now able to meet the criteria, or changes in technology allow for better environmental performance from the best 20% or so of that product category. Graphic 2 shows how these changes might take place over a period of years.

GRAPHIC 2: STRINGENCY OF CRITERIA

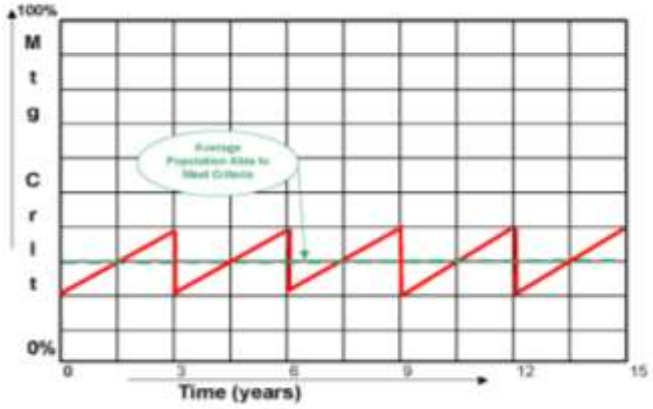


In Graphic 2, the stringency (the solid horizontal and vertical lines) is gradually increased in a stepwise fashion, resulting in a positive slope over time (the dashed line). Using the example of paper recycled content, the initial stringency would be set at some 70%, and then, depending on technology changes and any market shifts, the stringency could be raised to 75% after 3 years, and then to 80% three years later, and so on.

Effect of Increased Stringency on Population of Products Meeting the Criteria

Graphic 3 demonstrates how the product population able to meet the criteria of the day will change (theoretically of course) as stringency is increased. The resulting curve of the population of products able to meet the criteria in Graphic 3, while going up and then down with each change in stringency (saw-tooth curve), remains, on average, flat (dashed line).

GRAPHIC 3: PERCENT ABLE TO MEET CRITERIA



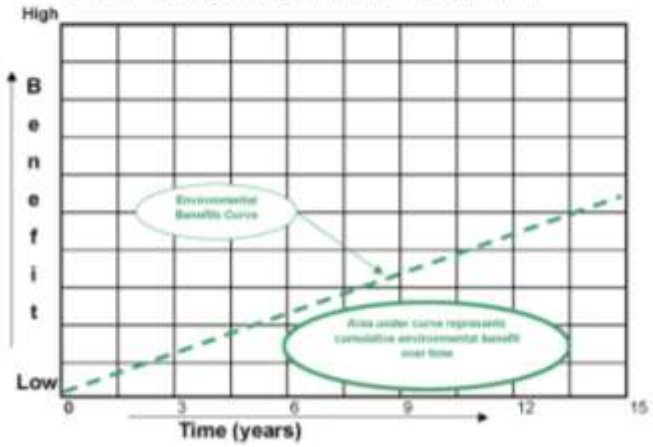
Using the paper example from the previous pages, the initial percent of the paper products would be about 20%. As market demand begins to be felt by suppliers, the demand for 70% recycled content paper will create pressure on suppliers to improve their products. This will normally result in an increase in the percent of products meeting the criteria (the upward left to right sloping line), After a pre-determined period of time, the criteria would be reviewed, and made more stringent (see graphic 2). The net result of this increased stringency is an immediate drop in the percent of products meeting the new requirements, usually back to the initial 20%. This cycle repeats itself over time, resulting in an, on average, flat (dashed line) curve that indicates that about 30% of products, on average, can meet the Eco-labelling criteria.

Environmental Benefit

Establishing the level of stringency and increasing that stringency over time, however, does not create environmental benefit directly. It simply sets the bar for the adopters of Eco-labels to achieve market advantage and thus increased market share. The environmental benefits begin to accumulate only when the market forces begin to act, and significant purchasing activity moves toward those environmentally preferable products. In other words, simply setting an Eco-labelling program in motion and certifying products does not create environmental benefit by itself. The benefits only begin to accrue when market forces begin to act and force the environmental profiles of the products being placed in the marketplace to improve.

The relative level of "environmental benefit" can be determined, again notionally, by adding the slope of Graphic 2 (positive) to that of Graphic 3 (flat) to give the cumulative environmental benefit curve of Graphic 4.

GRAPHIC 4: CUMULATIVE ENV'L BENEFIT



Impact of Market Pressure

There are a variety of ways that these relationships can be altered. For example, if one chooses a very high stringency from the outset (Graphics 1 & 2), then the amount of the product population able to meet the criteria will be extremely low (Graphic 3). While the population may increase slightly over time, the market pressure this very small population creates will not likely be sufficient to cause significant market share shifts, and therefore, there will be few related environmental benefits. Similarly, if the stringency is set too low, then far too many products could qualify, and again the markets forces will not be sufficient to cause the improvement process to be triggered. Whether 20% is the right target number is, of course, questionable, as the same effect might be had from a target population of 10% or even 40%. The challenge, however, is to set that level of stringency (for each product category) which will allow the market forces to act (pull performance). This is different from a regulatory push, which forces performance change across the sector in question.

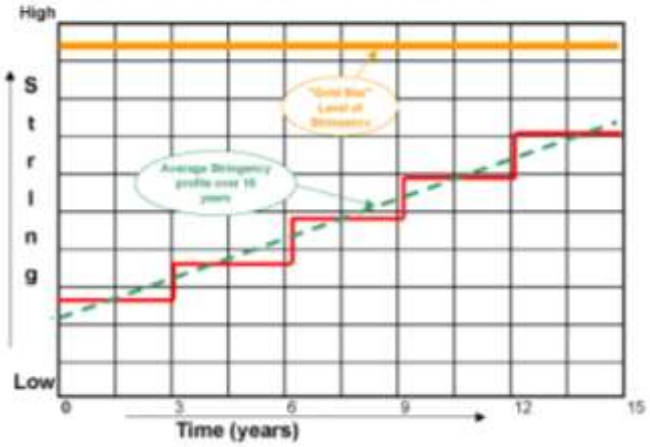
Accelerating Uptake

The horizontal scale of time could be compressed by accelerating the uptake of environmentally preferable and eco-labelled products. This can be achieved by having large institutional buyers (governments, schools, institutions, businesses) specify eco-labelled products (or at least eco-label criteria) or by engaging consumers to take action, or both. Naturally, any such acceleration also accelerates the delivery of environmental benefits.

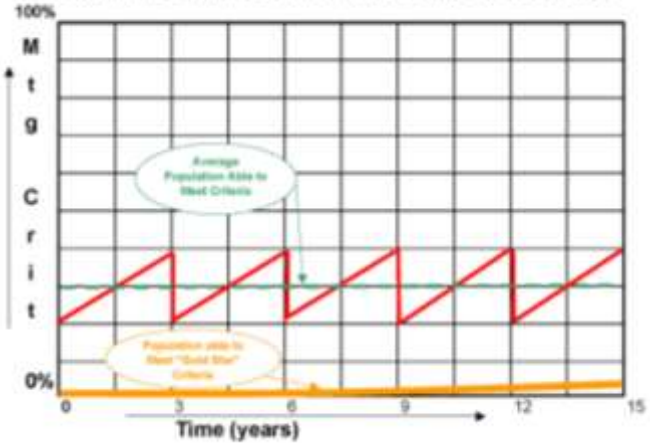
Environmental Awards

There are those who criticize Type I Eco-labels because they do not identify only the best products from an environmental perspective. The following graphs explain how environmental awards operate as opposed to Type I Eco-labels. While the initial stringency is set very high (Graphic 5 – "Gold Star" level), the population able to meet the "Gold Star" criteria will be extremely low (Graphic 6). This creates no competitive market force for change and thus the "Gold Star" related environmental benefit over time (Graph 7) is much lower than the normal stringency approach of Eco-labelling programs. Nonetheless, this is the approach used for award programs.

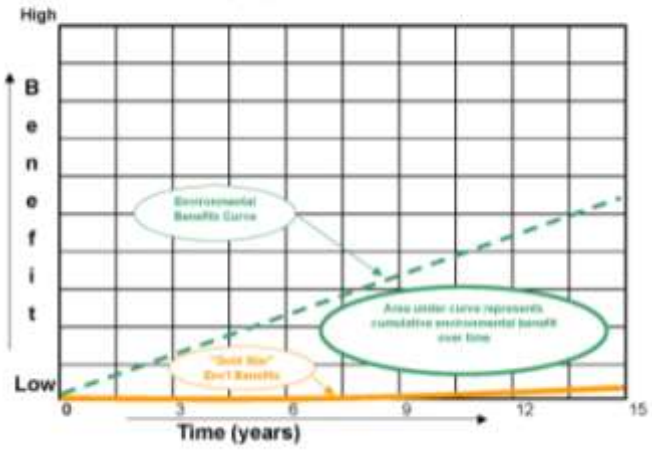
GRAPHIC 5: STRINGENCY OF CRITERIA



GRAPHIC 6: PERCENT ABLE TO MEET CRITERIA



GRAPHIC 7: CUMULATIVE ENV'L BENEFIT



2.3 Standards and Eco-labelling

2.3.1 Types of Standards and Labels

Types of Standards

Eco-labels are considered by some to fall into the broader category of environmental standards. In this regard, it should be noted that three different kinds of environmental standards can be developed. They are:

(a) process based environmental standards. These are standards that promote the incorporation of environmental considerations into decision making. The best examples are the various Environmental Management Systems (EMS) standards, including the ISO 14001 standard. These kinds of standards are normally considered only for companies and operations. Each operation or company sets its own environmental goals and targets. Certification to these standards does not automatically demonstrate any level of environmental performance. Instead, it means that the company has put an appropriate system in place.

(b) design based environmental standards. These are standards that prescribe how a product, service or facility is to be designed or operated from an environmental perspective.

performance based environmental standards. These are standards that require certified products to meet specific environmental performance requirements and most often include information on how the performance is to be measured, and how they should be reported.

Elements of Eco-labels

Eco-labels have come to be understood and used as any kind of environmental information system, and can be applied to products, services, facilities, and even resource bases. The main elements that distinguish these various types Eco-labels are:

- mandatory or voluntary;
- single attribute or life cycle based;
- applies to a single sector or multiple sectors;
- degree of independence (for label issuance as well as verification)
- type of label - information, relative rating or leadership.

ISO Types of Eco-labels

The International Organization for Standardization (ISO) has developed a series of “guidance” (as opposed to certification) standards related to environmental labels. They are:

- ISO 14020 - guidance on all types of Eco-labels
- ISO 14021 – guidance for self declared Eco-labels (Type II)
- ISO 14024 – guidance for environmental leadership Eco-labels (Type I)
- ISO 14025 – guidance for environmental declarations (Type III)

Type I Eco-label systems are based on the concept of performance standards, and, in terms of the elements above, are voluntary, are life cycle based, apply to multiple sectors, are third party verified, have third parties issue labels, and represent those products or services that demonstrate environmental leadership.

ISO 14020 Principles

The principles of ISO 14020 for environmental labels and declarations are as follows:

- Information shall be accurate, relevant and not misleading
- Procedures and requirements shall avoid unnecessary barriers to trade
- Shall be based on scientific methodology sufficiently thorough and comprehensive to support the claim and that produces accurate and reproducible results
- Information concerning related procedures and any criteria shall be made available upon request
- Development shall take into account all relevant aspects of the life cycle of the product
- shall not inhibit innovation
- administrative requirements for information shall be limited to those necessary to establish conformance
- the process should include open, participatory consultation. Reasonable efforts should be made to achieve consensus
- information on environmental aspects of products and services shall made be available to purchasers and potential purchasers.

ISO 14024 Principles

The principles of ISO 14024 are as follows:

- Participation is voluntary
- ISO 14020 Principles also apply
- Applicants shall comply with environmental and other relevant legislation
- Criteria development shall include comprehensive life cycle consideration approach
- Environmental criteria should differentiate environmentally preferable products from others
- Criteria should be based on indicators arising from life cycle considerations and be set at attainable and measurable levels
- Fitness for purpose and levels of performance [of products] should be taken into account when developing criteria
- Criteria shall be set with a predefined validity period and criteria and product function requirements shall be reviewed, and potentially revised, within predefined time periods
- A formal and open participation process shall be used for selection and review of product categories, environmental criteria and product function characteristics
- All [product] environmental criteria and function characteristics shall be verifiable. Compliance assessment shall incorporate generally acceptable standards and methods
- Transparency shall exist through all stages of Eco-labelling program development and operation; information on significant program aspects shall be available for inspection and comment by interested parties
- Unnecessary obstacles to international trade shall not exist
- Application and participation is open to all potential applicants
- Development and selection of criteria shall be based on sound scientific and engineering principles
- The program shall be free from undue influence

- Fees are kept as low as possible and applied equitably to all applicants and licensees
- Confidentiality of pertinent information is maintained
- Mutual recognition is deemed desirable

Other Types of Eco-labels

While the ISO has identified 3 Types of Eco-labels, in reality many more are already in place and more again are possible. Examples of other types of environmental labels include:

- Home Depot's EcoOptions program – voluntary, often single issue, self declared and may or may not represent leadership;
- Energy Star - voluntary, single issue, limited sector, self declared and leadership; and
- Forest Stewardship Council (FSC) – voluntary, single issue, third party verified, single sector, and leadership.

Environmental Issues in Eco-labels

Environmental issues typically considered in any kind of life cycle based information or leadership Eco-label could include:

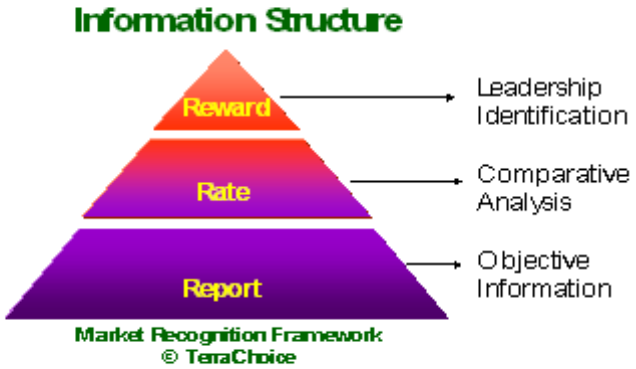
- pollution (or contamination) of air, water or soil
- energy management;
- waste management;
- resource consumption;
- resource depletion;
- natural resource management;
- biodiversity;
- ecosystem health; and
- human health.

Relationship Between Eco-labels

To use environmental information in the marketing of a product, activity, service or facility, the target audience becomes a key determinant in the approach chosen. Environmental Reports tend to fit a well-informed commercial audience (or a very well informed consumer), while Rating and Reward systems tend to better fit the average consumer (or a commercial or government operation with limited time or interest to digest substantial information).

Market Recognition Framework

The Market Recognition Framework© (copyright TerraChoice Group Inc – formerly TerraChoice Environmental Marketing Inc.) operates as a vertically integrated structure to provide the most appropriate information for the audience in question. In this context, vertically integrated means that a credible and relevant Reporting system cannot be developed without the foundation elements of sound science, life cycle considerations, independent verification, multi-stakeholder input, and eco-efficiency and sustainability considerations being observed. A credible and relevant Rating system (the next higher level) cannot be developed unless an information Reporting system is in place, and a formula or algorithm to allow for comparison of environmental performance is developed. And finally, a Reward-based system cannot be developed unless some form of Rating system is in place that allows for the identification of the top (20% or so) environmental performing products.



In the context of the Market Recognition Framework, an ISO 14025 Type III environmental declaration is a good example of a "Report". There are a variety of environmental "Rating" systems in the world, relating to hotels, marinas, and even restaurants. Examples of the "Reward" level include all of the Type I programs. The above examples are typically all life cycle based. The structure of Report, Rate, Reward, also applies to single issue environmental claims or even single sector labels, but these would not comply with the foundation elements which ensure comprehensive and credible claims.

Combining Reporting and Rating Systems

Some companies combine Reporting and Rating systems to assist them in making purchasing choices. For example, the Portland, Oregon organization Metafore, is working with a range of large multinational companies to help them in their paper purchasing. They have developed an Environmental Paper Assessment Tool, the EPAT[SM] (ref: http://www.metafore.org/index.php?p=Paper_Working_Group&s=263) that relies on a standardized Environmental "Report", for pulp and paper products and allows buyers to determine the relative environmental "Rating" of competing paper products. In essence, a Type III environmental declaration (a life cycle based environmental "Report") is prepared, and through a purchaser specific algorithm, in which the buyer's environmental priorities are integrated, a "Rating" of competing products is produced.

Type I Eco-labels

For Type I eco-label systems, all of the issues of concern are considered when developing criteria and an emphasis is put on that group of issues or attributes that differentiate products from each other.

The purpose of Type I systems or schemes is to "*reduce the stress on the environment by encouraging the demand for and supply of products and services that are more environmentally responsible*". (Ref ISO 14024)

These programs are designed on the premise that the environmental values of consumers could be used as a market force for environmental improvement. It is one of the very few market-based instruments available for environmental management.

Exercise

In terms of:

- mandatory or voluntary;
- degree of life cycle consideration;
- sectoral application;
- degree of independence (for label issuance as well as verification)
- type of label - information, relative rating or leadership.

Describe the following labels:

(1) Energy Star

(2) Organic Certified

(3) Forest Stewardship Council

(4) Marine Stewardship Council

(5) Blue Angel

(6) Environmental Product Declarations

2.3.2 Main Elements of Type I Eco-label Programmes

Introduction

Main elements:

(i) select product category
(ii) development of product specific certification criteria
(iii) communication - promotion to target companies and raising public awareness
(iv) verification and licensing

Examples of Type I Eco-labels

Identifying the Product Category of Interest

Three key elements must be in place in order for Eco-labels to generate the desired environmental and health benefits:

- there must be scope for sufficient improvement in the product category chosen. In other words, if the products in a target category are not significantly different environmentally, or if the product category has extremely small market presence and has small impact, then the environmental benefit of Eco-labelling related to these products will be insignificant;
- there must be a level of business interest in having products Eco-labelled. Any Eco-label related market force cannot be created if products don't get certified. Therefore, industry interest (either direct, or through market demands) is critical; and
- the target consumer audience must have some health and environmental understanding and interest in relation to the product category in order for them to appreciate that one product is environmentally superior to another and to exert the kind of market share shift that produces environmental benefit.

The identification of product categories for criteria development is usually undertaken:

- through market research (with focus on the three key elements above),
- through expression of interest from business / industry, or
- by direct governmental selection.

Process to Develop Criteria

(i) Research into the life cycle stages of the product category (or service) in question, and the related environmental and health impacts. This stage usually includes a review of what other programs around the world are doing in the target product category, where the different stages of the cycle take place, and whether any particular ecosystem sensitivities exist (eg more prone to water eutrophication).

(ii) Research into the particular marketplace for the product category, including number of players in the sector, degree of competition, and how the sector functions.

(iii) Identification of the differentiating attributes (ie those environmental and human health attributes or factors that actually vary from product to product).

(iv) Drafting of a background paper with proposed certification criteria. (more specific examples and discussion in module B)

(v) Identification of the interested parties and from them, convening a Criteria Review Committee (CRC), with representation from industry, government, consumers, academia and government, to review the background paper.

(vi) After taking the CRC comments into account, a draft Certification Criteria Document is prepared, provided to the interested parties and made available to the public at large for input and comment. In this process, this comment period is usually between 60 and 90 days.

(vii) Taking any public comments into account, the Criteria Document is finalized and made available for product certification.

Types of Criteria

Three different types of criteria are commonly used in Type I programs:

Threshold based criteria typically specify the environmental and health related performance levels for those differentiating factors (eg energy consumption, toxicity levels, recycled content) within which the product's performance must fall. Good examples include those criteria that have a recycled content requirement.

Load Points based criteria typically allow for balancing between a variety of differentiating factors or attributes. Points are allocated for different levels of performance for each attribute, and then added together. The total load point score must fall below (or above depending on design) a predetermined level, while the performance of each attribute must be better than a preset default (or threshold) level. Priority issues or parameters will be weighted more heavily. The Canadian EcoLogo^{M} criteria for paper products is a good example of a load point based CCD.

Exclusion List based: these are simply the exclusion of certain materials, ingredients or chemicals from the product. Criteria for the various cleaning products are good examples of exclusion list based CCDs

There are also examples of combinations of these three different approaches in criteria, where threshold values are set and exclusions are identified for certain important parameters, and a load point system is used for the other parameters of interest.

Communication

Two primary types of communication are required in any Eco-labelling program:

- selling the program to potential clients who have products to be certified; and
- engaging the purchasing public and procurement professionals in order that they actively seek out Eco-labelled products in their purchasing.

Verification

When applications are received, they will need to have their environmental attributes verified against the relevant certification criteria before being awarded the right to carry the eco-label.

Licensing and Ongoing Supervision

After being verified, the company enters into a licence agreement. This agreement is normally a legal document that not only provides permission for the relevant product to carry the eco-label, but also contains limitations in use of the eco-label and conditions for termination. Once the licensing is complete, the program managers will typically conduct spot checks on a rotating and random basis to ensure ongoing compliance with the terms of the agreement.

2.4 EU Policy Landscape on SCP and the EU Eco-label

2.4.1 Introduction

About this Module

This section provides important information on the European Union's political environment relevant to the EU eco-label. The experts will be introduced into overall policy frameworks of the European Union and various fields of environmental policy. Here, special attention will be given to the European Union's approach on the promotion of sustainable consumption and production patterns, namely the Integrated Product Policy as strategic approach and the EU Action Plan on Sustainable Consumption and Production (SCP) and Sustainable Industrial Policy (SIP) as new dynamic framework for action.

Learning Objectives

Get an overview of the EU policy landscape and relevant policy frameworks and legislative acts to better understand the political framework conditions of the EU eco-label.

This Learning Unit Provides

- basic facts on the European Union
- an overview of the role of environmental policy in the European Union
- an outline of important policy frameworks in the field of environmental policy and sustainable development
- the conceptual understanding and process of the European Union's approach of an Integrated Product Policy as baseline for SCP policy
- an outline of the European Union Action Plan on Sustainable Consumption and Production and Sustainable Industrial Policy as new framework for action.

2.4.2 Introduction to the European Union

Basic Facts

Established in 1951, the European Union is a pact between 27 sovereign nations which have resolved to share a common destiny and to pool an increasing share of their sovereignty. It touches on things that nearly half a billion Europeans care most deeply about: peace, economic and physical wellbeing, security, participatory democracy, justice and solidarity.

Mission

Europe's mission is to:

- provide peace, prosperity and stability for its peoples
- overcome the divisions on the continent
- ensure that its people can live in safety
- promote balanced economic and social development
- meet the challenges of globalisation and preserve the diversity of the peoples of Europe
- uphold the values that Europeans share, such as sustainable development and a sound environment, respect for human rights and the social market

economy.

Three Key Institutions

Legislation, along with EU policies in general, are the result of decisions taken by the institutional triangle made up of the

- Council (representing national governments),
- the European Parliament (representing the people) and
- the European Commission (a body independent of EU governments that upholds the collective European interest).

The Council

The Council of the European Union (also known as the Council of Ministers) is the EU's main decision-making body.

The Council has to agree unanimously on important questions such as amending the Treaties, launching a new common policy or allowing a new country to join the Union. In most other cases, qualified majority voting is used.

The European Parliament

The European Parliament is the elected body that represents the EU's citizens. It exercises political supervision over the EU's activities and takes part in the legislative process.

The European Commission

The European Commission is the third part of the institutional triangle that manages and runs the European Union. The European Commission is answerable to the Parliament. As the EU's executive arm, the Commission implements the decisions taken by the Council in areas such as agricultural, industry, energy and transport, consumer and health, environment and many more. It has wide powers to manage the EU's common policies, such as research and technology, overseas aid, regional development, etc. It also manages the budget for these policies.

Policy Making

Considering the objectives of the Europe's mission, the European Union acts in a wide range of policy areas — economic, social, regulatory and financial — where its action is beneficial to the Member States. These include:

- cohesion or solidarity policies in regional, agricultural and social affairs;
- innovation policies, which bring state-of-the-art technologies to fields such as environmental protection, research and development (R&D) and energy.
- integration policies in the fields in which the Member States consider it is in their best interests to work together within the EU framework (on issues like trade, globalisation, and the single market, measures to promote growth and jobs and many others.)

Process to Make Policy

Normally, the process to set up strategies and policies within the European Union could be described as follow:

Step 1: European Commission facilitates pre-consultation and discussion with interest groups, citizens, and experts on a specific strategy or policy proposal.

Step 2: European Commission makes a formal proposal (includes an impact assessment).

Step 3: Parliament and European Council/Council of Ministers decide jointly on the proposal based on the decision making procedures.

Step 4: After formal adoption and publication national or local authorities implement the policy or law.

Step 5: European Commission and Court monitor implementation.

Further Information

Further information of the constituency of the European Union and the role of the various institutions are available under:

http://europa.eu/index_en.htm

The European Commission provides “Europe at a glance”, a tool to learn about the European Union in 12 steps: http://europa.eu/abc/12lessons/index_en.htm

2.4.3 Key Strategies and Policy Frameworks

Introduction

To give guidance for the future pathway of the European Union's development and modernisation process and to give political impetus and response to urgent challenges, the institutions of the European Union develop overall strategies, like the Lisbon Strategy for Growth and Jobs, the EU Sustainable Development Strategy, the EU Consumer Strategy. These overall strategies are political frameworks for all the other measurements taken by the European Commission, like action programmes, action plans, and policy proposals and so on.

Lisbon Strategy for Growth and Jobs (and Sustainable Development)

Introduction

During the meeting of the European Council in Lisbon (March 2000), the Heads of State or Government launched a "Lisbon Strategy" aimed at making the European Union the most competitive economy in the world and achieving full employment by 2010. With the Lisbon Strategy, EU leaders adopted a ten-year programme (2000-2010) aimed at revitalising growth and sustainable development across the EU. They noted the challenges Europe was facing from globalisation, an ageing population, and the emergence of a worldwide information society. They resolved that economic and social reforms had to take place in the context of a positive strategy which combines competitiveness and social cohesion, and reaffirmed that the European social model, with its developed systems of social protection, must underpin the strategy.

Three Pillars

The Lisbon Strategy, developed at subsequent meetings of the European Council, rests on three pillars:

- An economic pillar preparing the ground for the transition to a competitive, dynamic, knowledge-based economy. Emphasis is placed on the need to adapt constantly to changes in the information society and to boost research and development.
- A social pillar designed to modernise the European social model by investing in human resources and combating social exclusion. The Member States are expected to invest in education and training, and to conduct an active policy for employment, making it easier to move to a knowledge economy.
- An environmental pillar, which was added at the Göteborg European Council meeting in June 2001, draws attention to the fact that economic growth must be decoupled from the use of natural resources.

Targets and Implementation

The Lisbon Strategy sets specific targets (reached by 2010) with a view to attaining the goals set in 2000 related to the above mentioned three pillars.

These are to be achieved through a range of policies that fall almost exclusively within the sphere of competence of the Member States. An open method of coordination (OMC) entailing the development of National Action and Reform Programmes has been introduced. To implement the Lisbon Strategy, Member

States undertake reforms at national level based on National Reform Programmes, presented in 2006, which cover a series of actions in four priority areas. Each year, Member States produce reports on the implementation of their National Reform Programmes.

Explanatory note: Further information on the Lisbon strategy and related fields: http://ec.europa.eu/growthandjobs/index_en.htm

Role and Impacts on Environmental Policy

As stated in the Lisbon Strategy, environment became one of the three pillars of modernisation policy for the further development of the European Union, aiming that economic growth must be decoupled from the use of natural resources. Formerly, this could be seen as starting point for a more systematic and integrative policy framework for sustainable development in the European Union.

Beside this, the European Union has been firmly committed to the environment since the early 1970s:

- protection of air and water quality
- conservation of resources and protection of biodiversity
- waste management and
- control of activities which have an adverse environmental impact.

These are just some of the areas in which the European Union is active, at both Member State level and internationally.

Europe's environment can only be well protected if Member States properly implement the legislation they have signed up to. This fact is important, because implementation of Community environmental legislation is to be ensured in the first place by Member States.

Overall policy frameworks for SCP

Introduction

The EU Sixth Environmental Action Programme (6th EAP) and the EU Sustainable Development Strategy (EU SDS) are the overall frameworks of environmental policy in the EU, setting overall priorities, objectives and measures to be met by all policy proposals which are setup by the European Commission, the European Parliament and the European Council in the given time period of validity.

Both approaches cover a wide range of policy issues and linkages with other policy areas which may cause a kind of complexity that is difficult to cover adequately in the train-the-trainer seminar.

Clear Reference Towards SCP

Important for the train-the-trainer seminar is that the EU 6th EAP and the EU SDS make clear reference to sustainable consumption and production and related issues, like Integrated Product Policy, the sustainable use of natural resources, waste management, recycling and prevention, eco-innovation and environmental technologies and so far.

Therefore, the learning objective is to become an overview and a good sense of the „political landscape" of eco-labelling in the European Union. This ability is needed, because eco-labelling is in political terms an activity with multi-dimensional objectives, trying to anticipate different problems, interests and rationalities.

Dynamics of Environmental Policy-making in the European Union

In the last decade, environmental policy in the European Union became very dynamic in terms of pluralistic perceptions, policy approaches, and frameworks for action. It is not intended to give a full coverage and a consistent picture of the existing policies where inconsistency is still a political reality. But it has to be clearly stated, that within the political constituency of the European Union environmental policy making has become much more rationalized and systematic in the last years,

moving towards better policy integration and coherence, and to give better guidance to the challenge of implementation within existing political, economic, and social realities.

Conflicting Issues

Furthermore, it was not possible to make special references between eco-labelling and the outlined policies covered in the training, nor it is intended to give special advice to the implementation of eco-labelling within different policy frameworks, including conflicting issues. This analytical task is open for future research and policy assessment still to come.

Sixth Environmental Action Programme (6th EAP)

Introduction

The 6th EAP is a decision of the European Parliament and the Council adopted on 22nd July 2002. It sets out the framework for environmental policy-making in the European Union for the period 2002-2012 and outlines actions that need to be taken to achieve them.

Priority Areas

The 6th EAP identifies four priority areas:

- climate change
- nature and biodiversity
- environment and health
- natural resources and waste.

Aim

The 6th EAP promotes full integration of environmental protection requirements into all Community policies and actions and provides the environmental component of the Community's strategy for sustainable development.

The link is made between environment and European objectives for growth, competitiveness and employment as outlined in the Lisbon Strategy.

Thematic Strategies

The 6th EAP calls for the development of seven Thematic Strategies in the field of:

- soil and the marine environment (in the priority area of biodiversity)
- air
- pesticides
- urban environment (in the priority area of environment, health and quality of life)
- natural resources
- waste and recycling (in the priority area of natural resources and waste).

The Thematic Strategies constitute the framework for action at EU level in each of the concerned priorities.

Strategic Approaches

Furthermore, the 6th EAP establishes strategic approaches to meet the environmental goals and sets objectives and priority actions on international issues. The strategic approaches include among others:

- the development of Community legislation and its effective implementation and enforcement
- the integration of environment protection requirements in other Community policies
- the promotion of sustainable production and consumption patterns, improving collaboration with enterprises and informing individual consumers, enterprises and public purchasers about the environmental impact of processes and products.

Further Information Further information is available under:
http://ec.europa.eu/environment/newprg/index.htm

EU Sustainable Development Strategy (EU SDS)

Introduction

Already in 1997 sustainable development became a fundamental objective of the EU when it was included in the Treaty of Amsterdam as an overarching objective of EU policies.

At the Gothenburg Summit in June 2001, EU leaders launched the first EU sustainable development strategy based on a proposal from the European Commission. The EU sustainable development strategy was composed of two main parts:

- the first part proposed objectives and policy measures to tackle a number of key unsustainable trends while
- the second part called for a new approach to policy-making that ensures the EU's economic, social and environmental policies mutually reinforce each other. The central instrument developed for this purpose was the obligation for the European Commission to submit each new major policy proposal to an Impact Assessment.

The EU SDS added a third, environmental dimension to the Lisbon Strategy of economic and social renewal. Therefore, the two strategies are complementary to each other.

Aim and Political Challenge

The Gothenburg declaration formed the core of the EU's policies towards sustainable development. But these also encompassed other programmes and commitments, such as the commitments made at the 2002 World Summit on Sustainable Development in Johannesburg and the Millennium Development Goals agreed in 2000, as well as global pledges to increase official development aid and to take account of the needs of developing countries in international trade.

Despite important achievements in implementing the EU SDS, unsustainable trends persist, ranging from climate change to the ageing of societies in developed countries and a widening gap between the rich and the poor in the world. The world surrounding the EU also changed significantly since 2001 with the enlargement of the European Union to 25 Member States by 2005, increased instability due to terrorist threats and violence, further globalization and changes in the world economy. This required a sustainable development strategy with a stronger focus, a clearer division of responsibilities, wider ownership and broader support, a stronger integration of the international dimension and more effective implementation and monitoring.

Renewed EU SD Strategy

Therefore, the European Council of June 2006 adopted an ambitious and comprehensive renewed SDS for an enlarged EU. The renewed SDS builds on the Gothenburg strategy of 2001 and is the result of an extensive review process that started in 2004.

The renewed EU SDS sets out a single, coherent strategy on how the EU will more effectively live up to its long-standing commitment to meet the challenges of sustainable development.

It recognises explicitly the need to gradually change European's current unsustainable consumption and production patterns and move towards a better integrated approach to policy-making. It reaffirms the need for global solidarity and recognises the importance of strengthening the work with partners outside the EU, including those rapidly developing countries which will have a significant impact on

	global sustainable development. The overall aim of the renewed EU Sustainable Development Strategy is to identify and develop actions to enable the EU to achieve a continuous long-term improvement of quality of life through the creation of sustainable communities able to manage and use resources efficiently, able to tap the ecological and social innovation potential of the economy and in the end able to ensure prosperity, environmental protection and social cohesion.
Overall Objectives and Action	The strategy sets overall objectives and concrete actions for seven key priority challenges for the coming period until 2010, many of which are predominantly environmental: • Climate change and clean energy • Sustainable transport • Sustainable consumption and production • Conservation and management of natural resources • Public Health • Social inclusion, demography and migration • Global poverty and sustainable development challenges.
Improve Synergies	To improve synergies and reduce trade-offs, a more integrated approach to policy making is proposed, based on better regulation (via impact assessment) and on the guiding principles for sustainable development (adopted by the European Council of June 2005).
External Dimension	The external dimension of sustainable development (e.g. global resource use, international development concerns) is factored into EU internal policy making and through integration of SD considerations in EU's external policies.
Participation and Coordination Mechanism	The EU SDS wants to be a strategy for the whole EU. It therefore proposes mechanisms for improving the coordination with other levels of governments and calls upon business, NGOs and citizens to become more involved in working for sustainable development.
Means of Implementation to Promote SCP	Within the EU SDS, education, research and public finance are stressed as important instruments in facilitating the transition to a more sustainable production and consumption patterns.
Monitoring	To monitor effective implementation of the EU SDS, the European Commission plans to produce a progress report every two years, starting with the first progress report in 2009. This report is to form the basis for discussion at the European Council, which will give guidance to the next steps in implementation of the EU SDS and associated measures. The report is now published (July 2009) for further consultation with Member States and stakeholders.
Further Information	Further information are available under: http://ec.europa.eu/environment/eussd/

2.4.4 Thematic Strategies and Policies

Introduction

To better understand the strategic set-up and objectives of the EU eco-label the further clarification of important fields of action within environmental policy is needed. At this point, the learning unit will examine general introductions into relevant environmental policy areas, like

- Climate Change and Energy Efficiency
- Sustainable Use of Natural Resources
- Waste Prevention and Recycling
- WEEE and RoHS
- Sustainable Production and Pollution Control
- Chemicals
- Eco-Innovation and Environmental Technologies
- CSR.

Some of these policy areas will be further elaborated in module B based on the specific characteristics and policy objectives of the four product groups (textiles, shoes, television, and paper).

This outline will be followed by a closer look on the evolving EU approach towards an Integrated Product Policy and Sustainable Consumption and Production, which special focus on the EU Action Plan on Sustainable Consumption and Production and Sustainable Industrial Policy.

Climate Change and Energy Efficiency

Introduction

Climate change is already happening and represents one of the greatest environmental, social and economic threats facing the planet. The European Union and Member States are committed to working constructively for a global agreement to control climate change, and is leading the way by taking ambitious action of its own.

The warming of the climate system is unequivocal, as is now evident from observations of increases in global average air and ocean temperatures, widespread melting of snow and ice, and rising global mean sea level. The Earth's average surface temperature has risen by 0.76° C since 1850. Most of the warming that has occurred over the last 50 years is very likely to have been caused by human activities.

To bring climate change to a halt, global greenhouse gas emissions must be reduced significantly.

Explanatory note: In its Fourth Assessment Report (AR4), published in 2007, the Intergovernmental Panel on Climate Change (IPCC) projects that, without further action to reduce greenhouse gas emissions, the global average surface temperature is likely to rise by a further 1.8-4.0°C this century, and by up to 6.4°C in the worst case scenario. Even the lower end of this range would take the temperature increase since pre-industrial times above 2°C - the threshold beyond which irreversible and possibly catastrophic changes become far more likely.

Europe's Contribution to the Kyoto Protocol

The European Union has long been at the forefront of international efforts to combat climate change and has played a key role in the development of the two major treaties addressing the issue:

- the 1992 United Nations Framework Convention on Climate Change (UNFCCC) and
- its Kyoto Protocol, agreed in 1997.

Monitoring data and projections indicate that the 15 countries that were EU members at the time of the EU's ratification of the Kyoto Protocol in 2002 will reach their Kyoto Protocol target for cutting greenhouse gas emissions. This requires emissions in 2008-2012 to be 8% below 1990 levels.

Aims of Europe's Climate Change Policy

The EU has been taking serious steps to address its own greenhouse gas emissions since the early 1990s.

In summary, the EU approach related to climate change, energy efficiency and other related fields is characterised by the following overall aims:

- Climate Change Policy
  - development of a long-term and integrative policy strategy
  - reduction in greenhouse gas emissions as priority objective
  - monitoring and adapting to the inevitable consequences of climate change
- the Kyoto Protocol and the EU's commitment in international negotiations
- less polluting, more efficient energy
  - focusing the energy market on security and sustainability of supply
  - controlling and rationalising energy consumption through energy efficiency
  - making renewable energy a genuine and affordable alternative
- cleaner and better-balanced transport
  - reconciling road and air transport with the environment
  - promoting transport by rail and waterways and intermodality
- competitive, responsible companies
- agriculture and land-use planning to benefit the environment
- adapted framework for innovation.

Policy Actions

To support these aims, the European Commission and the Member States draw up a wide spectrum of action plans, programmes, and supportive measures outlined below.

1 European Climate Change Policy 2000

In 2000 the Commission launched the European Climate Change Programme (ECCP). The ECCP has led to the adoption of a wide range of new policies and measures. These include the pioneering EU Emissions Trading System, which has become the cornerstone of EU efforts to reduce emissions cost-effectively, and legislation to tackle emissions of fluorinated greenhouse gases.

2 Foundation of EU Climate Change Strategy

On the basis of an analysis of the effects of climate change and the costs and benefits of action in this area, the European Commission established the foundation of a future EU climate change strategy in February 2005. The European Commission recommends that a number of elements should be included in the EU's climate change strategy:

- extension of action against climate change to all the polluting countries (with common but differentiated responsibilities) and sectors involved (all modes of transport, deforestation etc.);
- enhanced innovation, which includes the implementation and deployment of existing technologies and the development of new technologies (in particular by means of active support policies which take advantage of normal capital replacement);
- use and development of market-based instruments (such as the Emission Trading System introduced by the EU);
- harnessing of preventive and remedial efforts to adapt to climate change based on the most affected regions and economic sectors.

3 Action Plan on Energy Efficiency

Followed by a Green Paper on Energy Efficiency in 2005, the European Commission adopted an Action Plan on Energy Efficiency in 2007 aimed at achieving a 20% reduction in energy consumption by 2020. The Action Plan includes measures to improve the energy performance of products, buildings and services, to improve the

2005

yield of energy production and distribution, to reduce the impact of transport on energy consumption, to facilitate financing and investments in the sector, to encourage and consolidate rational energy consumption behaviour and to step up international action on energy efficiency.

4 EU Proposals for a Global Agreement 2007

In January 2007, as part of an integrated climate change and energy policy, the European Commission set out proposals and options for an ambitious global agreement in its Communication "Limiting Global Climate Change to 2 degrees Celsius: The way ahead for 2020 and beyond", which were endorsed by the Member States in March 2007. They committed the EU to cutting its greenhouse gas emissions by 30% of 1990 levels by 2020 provided other developed countries commit to making comparable reductions under a global agreement. And to start transforming Europe into a highly energy-efficient, low-carbon economy, they committed to cutting emissions by at least 20% independently of what other countries decide to do.

To underpin these commitments, the EU sets three key targets to be met by 2020:

- a 20% reduction in energy consumption compared with projected trends;
- an increase to 20% in renewable energies' share of total energy consumption; and
- an increase to 10% in the share of petrol and diesel consumption from sustainably-produced biofuels.

5 EU Proposals for Low-carbon Economy 2008

On 23 January 2008 the European Commission put forward a far-reaching package of proposals that delivers on the European Union's ambitious commitments to fight climate change and promote renewable energy up to 2020 and beyond. In December 2008 the European Parliament and Council reached an agreement on the package that will help transform Europe into a low-carbon economy and increase its energy security. Based on the targets outlined before the package sets out the contribution expected from each Member State to meeting these targets and proposes a series of measures to help achieve them.

6 EU White Paper on Climate Change Adaptation

In April 2009 the European Commission presented a policy („White Paper“) which presents the framework for adaptation measures and policies to reduce the European Union's vulnerability to the impacts of climate change. The objective of the EU’s Adaptation Framework is to improve the EU’s resilience to deal with the impact of climate change. The EU’s framework adopts a phased approach. The intention is that phase 1 (2009-2012) will lay the ground work for preparing a comprehensive EU adaptation strategy to be implemented during phase 2, commencing in 2013. Phase 1 will focus on four pillars of action:

- building a solid knowledge base on the impact and consequences of climate change for the EU
- integrating adaptation into EU key policy areas
- employing a combination of policy instruments (market-based instruments, guidelines, public-private partnerships) to ensure effective delivery of adaptation and
- stepping up international cooperation on adaptation.

Current Targets and Measures for 2020

To move the European Union towards a low-carbon economy the following targets and measures are setup to be reached by 2020:

- strengthening and expansion of the Emission Trading System (EU ETS): emissions from the sectors covered by the system will be cut by 21% by 2020 compared with levels in 2005. A single EU-wide cap on ETS emissions will be set, and free allocation of emission allowances will be progressively replaced by auctioning of allowances by 2020.
- Emissions from sectors not included in the EU ETS –such as transport,

housing, agriculture and waste will be cut by 10% from 2005 levels by 2020. Each Member State will contribute to this effort according to its relative wealth, with national emission targets ranging from -20% for richer Member States to +20% for poorer ones.

- The national renewable energy targets proposed for each Member State will contribute to achieving emissions reductions and will also decrease the European Union's dependence on foreign sources of energy. These include a minimum 10% share for biofuels in petrol and diesel by 2020. The package also sets out sustainability criteria that biofuels will have to meet to ensure they deliver real environmental benefits.
- The package also seeks to promote the development and safe use of carbon capture and storage (CCS), a suite of technologies that allows the carbon dioxide emitted by industrial processes to be captured and stored underground where it cannot contribute to global warming. Revised guidelines on state aid for environmental protection will enable governments to support CCS demonstration plants.

Relevance to the EU Eco-label

To combat climate change and to promote energy efficiency are overall objectives of the European Union's environmental policy. Since the establishment of the EU eco-label, energy related aspects of products play an important part, e. g. in the strategy development, the product group development, and the criteria development. Furthermore, the carbon footprint of products gained increased attention in the last years and mounted in several activities by the European Commission and the Member States (e. g. development of methodological approaches and schemes).

Further Information

Further information on climate change and energy efficiency are available under: http://ec.europa.eu/environment/climat/home_en.htm

Sustainable Use of Natural Resources

Introduction

As demanded by the 6th EAP the European Commission proposed a Strategy on the Sustainable Use of Natural Resources used in Europe on 21 December 2005.

Objectives

The objective of the strategy is to reduce the environmental impacts associated with resource use and to do so in a growing economy. Focusing on the environmental impacts of resource use will be a decisive factor in helping the EU to achieve sustainable development.

The objective of the strategy can be described as: "ensuring that the consumption of resources and their associated impacts do not exceed the carrying capacity of the environment and breaking the linkages between economic growth and resource use". (concept of de-coupling)

In practical terms, this means reducing the environmental impact of resource use while at the same time improving resource productivity overall across the EU economy. For renewable resources this means also staying below the threshold of overexploitation.

Fields of Action

To achieve this objective, the strategy includes actions to:

- improve the understanding and knowledge of European resource use, its negative environmental impact and significance in the EU and globally
- develop tools to monitor and report progress in the EU, Member States and economic sectors
- foster the application of strategic approaches and processes both in economic sectors and in the Member States and encourage them to develop related plans and programmes
- raise awareness among stakeholders and citizens of the significant negative environmental impact of resource use.

The strategy will enable knowledge of resource use in the economy to be brought together quicker and more easily This will allow the most serious environmental impacts of resource use to be identified and measures taken to alleviate them.

Time Horizon

The European Commission proposed a time horizon of 25 years in which policies become effective to change current trends in the use of natural resources and to achieve the strengthening and integration of the resource use dimension in policy formulation.

Targets

The strategy does not set quantitative targets for "resource efficiency and the diminished use of resources" as prescribed by the 6th EAP, because it is not possible to do so with the current stage of knowledge and state of development of indicators. As stated by the Commission, neither the data underpinnings nor the indicators allow targets to be set that would clearly serve the purpose of reducing environmental impacts in a growing economy. The strategy does, however, set a process in motion whereby this could be possible over the course of the next five or ten years.

Relevance for SCP and EU eco-label

The Thematic Strategy is closely linked to the EU Action Plan on Sustainable Consumption and Production and Sustainable Industrial Policy which was launched by the European Commission in July 2008. Beside energy efficiency, the reduction of the use of natural resources is a priority area within the EU eco-label (e. g. water, materials).

Further Information

Further information are available: http://ec.europa.eu/environment/natres/index.htm

Waste Policy

Introduction

Current EU waste policy is based on a concept known as the waste hierarchy. This means that, ideally, waste should be prevented and what cannot be prevented should be re-used, recycled and recovered as much as feasible, with landfill being used as little as possible. Landfill is the worst option for the environment as it signifies a loss of resources and could turn into a future environmental liability. The waste hierarchy should not be seen as a hard-and-fast rule, particularly since different waste treatment methods can have different environmental impact. However, the aim of moving towards a recycling and recovery society means moving up the hierarchy, away from landfill and more and more to recycling and recovery.

EU Legal Framework

The legal framework underpinning this strategic approach includes horizontal legislation on waste management, e.g.

- the Waste Framework Directive
- the Hazardous Waste Directive
- the Waste Shipment Regulation.

These are complemented by more detailed legislation concerning waste treatment and disposal operations, such as

- the Landfill and Incineration Directives,
- legislation to regulate the management of specific waste streams (waste oils, PCBs/PCTs and batteries).

Recycling and recovery targets have been set for some key waste flows, i.e. packaging, end-of-life vehicles (ELVs) and waste electrical and electronic equipment (WEEE).

Further Information	An introduction towards the EU's waste policy will be found under: http://ec.europa.eu/environment/waste/index.htm

Strategy on Prevention and Recycling of Waste

Introduction	In May 2003, the Commission adopted a Communication 'Towards a Thematic Strategy on the Prevention and Recycling of Waste' setting out a wide range of suggestions and ideas for the possible future development of policy on waste in the European Union.
Overall Goal	The long-term goal is for the EU to become a recycling society that seeks to avoid waste and uses waste as a resource. With high environmental reference standards in place the internal market will facilitate recycling and recovery activities.
Objectives	The main objectives of the waste prevention and recycling strategy are: reduce, via a comprehensive and life cycle based approach, the environmental impact of waste and waste treatment operations.
Important Measures	In order to achieve these objectives and, hence, secure a higher level of environmental protection, the proposal is to modernise the existing legal framework – i.e. to introduce lifecycle analysis in policymaking and to clarify, simplify and streamline EU waste law. This will contribute to resolving current implementation problems and move the EU decisively onto the path of becoming an economically and environmentally efficient recycling society. Therefore, the Strategy proposes the following important measures: • a revision of the Waste Framework Directive (including the definition of disposal and recovery and clarifying the borders of the waste definition) and • the development of a framework for waste prevention action.
Relevance for the EU eco-label	Waste related issues are important objectives for the EU eco-label in terms of waste prevention or waste minimisation. Related to other eco-label schemes, like the German Blue Angel, recycled material or recycling products are not priorities under the EU eco-label so far.
Further Information	Please find further information on the waste strategy: http://ec.europa.eu/environment/waste/strategy.htm

Waste Framework Directive

Introduction	To underline the objectives of the thematic strategy on the prevention and recycling of waste several new legislative proposals were made by the European Commission to specify the implementation of waste policies throughout the European Union. One important piece of legislation is the Waste Framework Directive which was finally adopted on 5 April 2006 and came into force by 17 May 2006. The Waste Framework Directive replaced the Directive 75/422/EEC on waste and related amendments.
Objectives and	Under the Waste Framework Directive Member States shall take the appropriate measures to encourage:

Measures

- the prevention or reduction of waste production and its harmfulness, in particular by:
  - the development of clean technologies more sparing in their use of natural resources
  - the technical development and marketing of products designed so as to make no contribution or to make the smallest possible contribution, by the nature of their manufacture, use or disposal, to increasing the amount or harmfulness of waste and pollution hazards
  - the development of appropriate techniques for the final disposal of dangerous substances contained in waste destined for recovery
  - the recovery of waste by means of recycling, re-use or reclamation or any other process with a view to extracting secondary raw materials
  - the use of waste as a source of energy.
- to prohibit the abandonment, dumping or uncontrolled disposal of waste
- to establish an integrated and adequate network of disposal installations, taking account of the best available technology not involving excessive costs
- to establish or designate the competent authority or authorities to be responsible for implementing this Directive
- to draw up (national) waste management plans
- the proper handling of waste, including transportation of waste.

Revision of the Framework Directive

Meanwhile, the European Commission adopted a new Directive on waste (2008/98/EC) at 19 November 2008. The new Waste Framework Directive foresees a new approach to waste management based primarily on prevention, respect for human health and the environment, and limiting the production of waste, as well as encouraging the use of waste as a resource by recycling and recovery.

The Directive creates a differentiated 5-level waste hierarchy:

- prevention
- preparing for re-use
- recycling
- other recovery, e.g. energy recovery; and
- disposal.

It aims to introduce waste prevention programmes as a new policy instrument for the Members States. Recycling and recovery of waste are being promoted by targets, separate collection and energy efficiency criteria. The producer responsibility principle has been extended and Member States will have to find ways to transpose this principle, taking into account their national administrative structures and the role played by municipalities.

The new Directive puts emphasize on clearer definitions of by-products, end-of-waste, recycling and recovery and a stronger focus on waste management plans is expected to support a better implementation of waste management law.

The Directive must be implemented by Member States before 12 December 2010.

Further Information

Information on the Framework Directive:

http://ec.europa.eu/environment/waste/legislation/a.htm

WEEE and RoHS

Introduction

Within the framework of EU's waste policy, the EU provides legislation restricting the use of hazardous substances in electrical and electric equipment (Directive 2002/95/EC) and promoting the collection and recycling of such equipment (Directive 2002/96/EC), which has been in force since February 2003. The legislations in this field are subject of an extended producer's responsibility approach of the European

Union.

WEEE (Waste Electrical and Electronic Equipment)

The legislation provides for the creation of collection schemes where consumers return their used e-waste free of charge. The objective of these schemes is to increase the recycling and/or re-use of such products.

Inadequately treated products pose major environmental and health risks. In December 2008 the European Commission proposed to revise the directives on electrical and electronic equipment in order to tackle the fast increasing waste stream of such products. The aim is to increase the amount of e-waste that is appropriately treated and reduce the number that go to final disposal. The proposals also aim reduce administrative burden.

The Commission proposes to set mandatory collection targets equal to 65% of the average weight of electrical and electronic equipment placed on the market over the two previous years in each Member State. The recycling and recovery targets of such equipment now cover the re-use of whole appliances and weight-base targets will increase by 5%. Targets will also be set for the recovery of medical devices.

Member States where the consumption of electrical and electronic equipment is widespread would have more ambitious targets under the new directive while others with smaller markets will have less ambitious targets.

RoHS (Restriction of Hazardous Substances)

It also requires heavy metals such as lead, mercury, cadmium, and chromium and flame retardants such as polybrominated biphenyls (PBB) or polybrominated diphenyl ethers (PBDE) to be substituted by safer alternatives.

Relevance to the EU Eco-label

Both legislations are relevant for product groups in the field of electrical appliances (like televisions) and others which are covered by these legislations.

Further Information

Information on the legislation under:
http://ec.europa.eu/environment/waste/weee/index_en.htm

Integrated Pollution and Prevention Control – IPPC Directive (1996/61/EC)

Introduction

Industrial production processes account for a considerable share of the overall pollution in Europe (for emissions of greenhouse gases and acidifying substances, wastewater emissions and waste). To minimise pollution from various industrial sources throughout the European Union, the EU has in 1996 a set of common rules for permitting and controlling industrial installations in the IPPC Directive of 1996/61/EC.

Operators of industrial installations covered by Annex I of the IPPC Directive are required to obtain an authorisation (environmental permit) from the authorities in the EU countries.

About 52.000 installations are covered by the IPPC Directive in the EU.

New installations, and existing installations which are subject to "substantial changes", have been required to meet the requirements of the IPPC Directive since 30 October 1999. Other existing installations had to be brought into compliance by 30 October 2007. This was the key deadline for the full implementation of the Directive.

Principles	The IPPC Directive is based on several principles as outlined below.
1 An Integrated Approach	Explanatory note: The integrated approach means that the permits must take into account the whole environmental performance of the plant, covering e.g. emissions to air, water and land, generation of waste, use of raw materials, energy efficiency, noise, prevention of accidents, and restoration of the site upon closure. The purpose of the Directive is to ensure a high level of protection of the environment taken as a whole.
2 Best Available Techniques	Explanatory note: The permit conditions including emission limit values (ELVs) must be based on Best Available Techniques (BAT), as defined in the IPPC Directive. To assist the licensing authorities and companies to determine BAT, the European Commission organises an exchange of information between experts from the EU Member States, industry and environmental organizations. This work is co-ordinated by the European IPPC Bureau of the Institute for Prospective Technology Studies at the EU Joint Research Centre in Seville (Spain). This results in the adoption and publication by the European Commission of the BAT Reference Documents (the so-called BREFs). Executive summaries of the BREFs are translated into the official EU languages.
3 Flexibility	Explanatory note: The IPPC Directive contains elements of flexibility by allowing the licensing authorities, in determining permit conditions, to take into account: (a) the technical characteristics of the installation, (b) its geographical location and (c) the local environmental conditions.
4 Public Participation	The Directive ensures that the public has a right to participate in the decision making process, and to be informed of its consequences, by having access to: (a) permit applications in order to give opinions (b) permits (c) results of the monitoring of releases and (d) the European Pollutant Release and Transfer Register (E-PRTR) (former European Pollutant Emission Register - EPER). Explanatory note: In E-PRTR, emission data reported by Member States are made accessible in a public register, which is intended to provide environmental information on major industrial activities.
Revision	On 21 December 2007 the European Commission adopted a proposal for a new Directive on Industrial Emissions. The proposal recasts seven existing Directives related to industrial emissions into a single clear and coherent legislative instrument. The recast includes in particular the IPPC Directive.
Relevance to the EU Eco-label	Due to the provision of the regulation, that the EU eco-label shall take all life stages of a product into account, production related aspects are key for some product groups under the EU eco-label scheme, like textiles, shoes, paper products.
Further Information	Further information on the IPPC Directive and on industrial pollution control: http://ec.europa.eu/environment/air/pollutants/stationary/ippc/index.htm

European Technologies Action Plan (ETAP)

Introduction

The European Technologies Action Plan (ETAP) was adopted by the European Commission in 2004.

The objective of the ETAP is to boost development and use of environmental technologies to improve the environment and European competitiveness in this area, and enable the EU to become the recognised world leader.

It complements the Environment Directorate-General's regulatory approaches and directly addresses the three dimensions of the Lisbon strategy: growth, jobs and the environment.

Challenge and Potential of Eco-Innovations

In several meetings the European Council emphasized the important role and contribution of eco-innovations and environmental technologies for growth, export markets, employment, to combat climate change and stimulate the sustainable use of natural resources.

The European Council of March 2008 stressed the importance of targeted actions to encourage market take-up and mobilise financing for R&D on eco-innovations and environmental technologies, in particular in promising areas such as renewable energy, construction, food and drink, energy-efficient water-technologies, transport (electric cars, bio-fuels), recycling and waste water, fully drawing on the potential of lead markets, public procurement, dynamic performance requirements (benchmarks) such as the top-runner approach, and considering environmental technology verification and other instruments.

Explanatory note: Studies on the market potential show an increasing demand for such eco-innovations and technologies in the next decade. By 2020 the global market potential lies over 3.000 billion EUR. (Berger 2009)

Aim

The aim of the ETAP is to overcome the many barriers – such as the complexity of switching from traditional to new technologies and insufficient access to capital – that hinder the development of environmental technologies.

Measures to Promote Eco-innovation

This is being achieved through a series of measures to promote eco-innovation and the take-up of such technologies. Under ETAP, priority is given to the following areas of action:

- Getting from research to markets
  - actions improving the innovation process and moving inventions from laboratories to the market
- Improving market conditions
  - actions aiming at encouraging the market uptake of environmental technologies and providing positive incentives such as regulatory frameworks, voluntary schemes, access to finance and green procurement/technology procurement
- Acting globally
  - actions supporting environmental technologies in developing countries, and promoting foreign investment

Other ETAP actions are tightly linked to technological research:

- Creation of a network of technological centres able to validate and promote environmental technologies
- Definition of environmental standards
- Promotion of clean technologies in developing countries to reinforce international research co-operation

- Widening the targeted distribution of information on environmental technologies to potential investors, particularly in the private sector, to all EU Member States, Associate States and in third countries.

High Level Working Group

To facilitate implementation of ETAP all over Europe, and to steer co-operation between all participants, a High Level Working Group (HLWG) was established in 2004. It is composed of representatives from the EU Member States and from European Commission services – primarily the Environment DG but with other DGs participating.

The objectives of the High Level Working Group are:

- exchange ideas on best practices
- development of indicators
- setting guidelines and timetables and
- further development of ETAP.

European Forum on Eco-Innovation

ETAP's full success relies on the participation of all stakeholders and thus the mobilisation of relevant business and finance players and technology developers working in the field. For this reason, the European Forum on Eco-Innovation has been set up with regular meetings organised as conference-type events. The Forum provides a platform for discussion, debate, and interaction. It fosters the mobilisation towards common objectives and concrete strategies for future action. The last European Forum on Eco-Innovation took place in April 2009 in Berlin, Germany.

Status of Implementation

The European Commission released several reports on the implementation of the ETAP, summarising the main achievements of the Action Plan, outlining some Member State actions on which implementation of ETAP can build areas where efforts could be stepped up to make faster progress towards the full potential of environmental technologies.

Relevance to the EU Eco-label

At the moment there are no direct linkages between the ETAP process and the EU eco-label, but it could be stated, that the EU eco-label addressed several issues related to the promotion of technological innovations in the environmental field, like the question of energy production, waste water treatment etc. Here, the EU eco-label functions as facilitator for eco-innovations in the European Union. This inter-linkage will be further strengthened under the implementation of the EU Action Plan on Sustainable Consumption and Production and Sustainable Industrial Policy.

Further Information

All information on the ETAP process: http://ec.europa.eu/environment/etap/

REACH

Introduction

REACH is a European Community Regulation (EC 1907/2006) on chemicals and their safe use, which entered into force on 1 June 2007.

The REACH Regulation deals with the

- **R**egistration
- **E**valuation
- **A**uthorisation and
- Restriction of **Ch**emical substances.

Aim

The aim of REACH is:

- to improve the protection of human health and the environment through the better and earlier identification of the intrinsic properties of chemical substances.
- to enhance innovative capability and competitiveness of the EU chemicals industry.

The benefits of the REACH system will come gradually, as more and more substances are phased into REACH.

Objectives

The REACH Regulation gives greater responsibility to industry to manage the risks from chemicals and to provide safety information on the substances.

The Regulation also calls for the progressive substitution of the most dangerous chemicals when suitable alternatives have been identified.

REACH provisions will be phased-in over 11 years after entry into force (by 2018).

Role of ECHA

Manufacturers and importers will be required to gather information on the properties of their chemical substances, which will allow their safe handling, and to register the information in a central database run by the European Chemicals Agency (ECHA) in Helsinki. ECHA will act as the central point in the REACH system:

- it will manage the databases necessary to operate the system
- co-ordinate the in-depth evaluation of suspicious chemicals and
- run a public database in which consumers and professionals can find hazard information.

Relevance to the EU Eco-label

Due to the fact, that chemicals are part of nearly any product, REACH has become a very important framework and reference for the EU eco-label. Further information on the REACH Regulation and their application will be given in module B.

Further Information

Further information:

http://ec.europa.eu/environment/chemicals/reach/reach_intro.htm

CSR Policy

Introduction

Corporate social responsibility (CSR) is a concept whereby companies integrate social and environmental concerns in their business operations and in their interaction with their stakeholders on a voluntary basis. It is about enterprises deciding to go beyond minimum legal requirements and obligations stemming from collective agreements in order to address societal needs. Through CSR, enterprises of all sizes, in cooperation with their stakeholders, can help to reconcile economic, social and environmental ambitions. As such, CSR has become an increasingly important concept both globally and within the EU, and is part of the debate about globalisation, competitiveness and sustainability. In Europe, the promotion of CSR reflects the need to defend common values and increase the sense of solidarity and cohesion.

Policy Framework

The European Commission introduced CSR policy as follow-up of the Lisbon Strategy and the EU SDS by:

- a Green Paper (2001),
- a Communication (2002),
- setting up of an EU Multi-Stakeholder Forum on CSR (CSR
- Forum), and
- a Communication (2006), including the launch of the European Alliance on

CSR.

Compared to other policy areas, CSR policy in the European Union is based purely on a voluntary framework. With their activities, the European Commission (with broad support by the European Parliament and the Council) wishes to give greater political visibility to CSR, to acknowledge what European enterprises already do in this field and to encourage them to do more.

Explanatory note: In the view of the European Commission, CSR is fundamentally about voluntary business behaviour, an approach involving additional obligations and administrative requirements for business risks being counter-productive and would be contrary to the principles of better regulation.

Potential of CSR

In the view of the European Commission, CSR can contribute to a number of public policy objectives, such as:

- more integrated labour markets and higher levels of social inclusion
- investment in skills development, life-long learning and employability
- improvements in public health
- better innovation performance
- a more rational use of natural resources and reduced levels of pollution, notably thanks to investments in eco-innovation and to the voluntary adoption of environmental management systems and labelling
- a more positive image of business and entrepreneurs in society
- greater respect for human rights, environmental protection and core labour standards, especially in developing countries
- poverty reduction and progress towards the Millennium Development Goals.

Fields of Action

In the Communication on “Implementing the Partnership for Growth and Jobs: Making Europe a Pole of Excellence on Corporate Social Responsibility” the European Commission proposed further actions to support a better CSR implementation:

- awareness-raising and best practice exchange
- support to multi-stakeholder initiatives
- cooperation with Member States
- consumer information and transparency
- research
- education.
- sMEs
- the international dimension of CSR.

CSR Forum

One important step towards a CSR approach at the level of the European Union was the setup of the CSR Forum. The CSR Forum brought together representatives of business, trade unions and civil society, with the European Commission in a facilitating role.

The CSR Forum aimed to promote innovation, transparency and convergence of CSR practices and instruments through:

- improving knowledge on the relationship between CSR and sustainable development (including its impact on competitiveness, social cohesion and environmental protection) by facilitating the exchange of experience and good practices and bringing together existing CSR instruments and initiatives, with a special emphasis on SME specific aspects
- exploring the appropriateness of establishing common guiding principles for CSR practices and instruments, taking into account existing EU initiatives and legislation and internationally agreed instruments such as OECD Guidelines for multinational enterprises, Council of Europe Social Charter, ILO core labour conventions and the International Bill of Human Rights.

The CSR Forum was organized in four thematic roundtables which examined the following issues:

- improving knowledge about CSR and facilitating the exchange of experience and good practice
- fostering CSR among SMEs
- diversity, convergence and transparency of CSR policies and tools and
- development aspects of CSR.

Relevance to the EU Eco-label

The EU's CSR policy could be seen as supportive framework towards the promotion of the EU eco-label.

Further Information

More information of the CSR policy framework:
http://ec.europa.eu/enterprise/csr/index_en.htm

2.4.5 Europe's way towards a SCP policy approach

Introduction

To meet and adequately respond to the great challenges of sustainable development, outlined in the AGENDA 21 by UNCED 1992, since the mid of the 1990s it became obvious in the political debate, that the setup of "stand alone" instruments, like the EU eco-label or the EMAS scheme, are not enough to make the needed transformation of the economy and society towards sustainability a reality for Europe.

It became clear, that a new type of „integrative" policy approach was needed to meet the challenge of decoupling economic growth from resource depletion and environmental degradation, by ensuring an increased quality of life for all people and to overcome several gaps of injustice.

Environmental Policy as Driver for Sustainable Development

As outlined before, the development of environmental policy within the European Union showed a significant change: environmental policy became a strong driver for sustainable development, trying to shape economic and social development within ecological limits, resulting in the setup of an overall policy framework for sustainable development in the European Union.

EU's Strategic Policy Approach

The crucial question within the European Union and on Member State level was on how to address the issue of changing consumption and production patterns adequately and to build up a strategic policy approach, which is nowadays known as SCP policy. The response of the European Union to this emerging question was the setup of a strategic approach of an Integrated Product Policy, which was firstly addressed by an Informal Meeting of the Council of Environmental Ministers in May 1999, in Weimar, Germany.

Since this initiating political discussion on a more strategic approach on Integrated Product Policy, the issue of promoting sustainable products and sustainable consumption evolved more and more to an elaborated field of policy implementation in the EU, which is characterised almost by its cross-cutting nature and mix of (primarily voluntary and supportive) policy instruments.

SCP and IPP

It will be outlined, that with the launch of the EU Action Plan on Sustainable Consumption and Production and Sustainable Industrial Policy in July 2008 the European Union moved into a new phase by transforming the IPP approach into a wider SCP policy approach, setting a more dynamic framework to promote the shift towards more sustainable consumption and production practice in Europe, and to better fulfil international commitments, like the Johannesburg Plan of Implementation of 2002 and its call to promote regional and national initiatives to

promote sustainable consumption and production within the development of a global 10-year framework of programmes, the so-called Marrakech process.

Integrated Product Policy

Introduction

The European Commission started to introduce the concept of an Integrated Product Policy by mid of the 1990ties, exploring already existing experiences and approaches in the Member States as starting points to develop a genuine European approach on IPP. It took more than three years of internal and external consultation to develop a common understanding on how an IPP approach on the European Union should look like. There was a controversial discussion among stakeholder groups, but also among Member States, on the political setup of an European IPP approach: there was a strong opposition against the setup of an own policy framework with specific legislative measurements on product policies beside the existing ones. On a very early stage of the discussion it became already clear, that an European approach on IPP should be seen more as a supportive framework to existing policies, like climate change and energy efficiency, chemicals and hazardous substances, waste and recycling etc., focussing clearly on the voluntary character of the proposed measures which goes beyond minimum requirements of the existing legislation.

Based on this understanding, voluntary instruments to promote the greening of product standards and sustainable consumption, like eco-labelling, standardisation, or environmental management systems, but also public procurement, has become important roles within this strategic approach of environmental policy making.

Basic Principles of IPP

At the beginning of the political debate, the discussion were centred much more on the basic principles of an IPP approach:

- Integration
- Cooperation
- Communication.

These three principles of IPP has become the bottom-line to initiate the needed environmental innovation processes along the life-cycles of the products (integration) and to further promote the cooperation and communication between government, business, and the consumers.

Common Understanding

At the Informal Meeting of the Environmental Council in May 1999 a common understanding was expressed, that IPP is at first hand a governmental policy to promote the better application of eco-efficient product developments (eco-design) and the diffusion of environmental-friendly products on the market, using several voluntary measurements to be applied by enterprises.

In the view of the European Commission, all products cause environmental degradation in some way, whether from their manufacturing, use or disposal. Therefore, Integrated Product Policy (IPP) seeks to minimise these by looking at all phases of a products' life-cycle and taking action where it is most effective.

Furthermore, IPP involves many different actors such as designers, industry, marketing people, retailers and consumers. IPP attempts to stimulate each part of these individual phases to improve their environmental performance.

With so many different products and actors there can not be one simple policy measure for everything. Instead there is a whole variety of tools - both voluntary and mandatory - that can be used to achieve this objective. These include measures such as economic instruments, substance bans, voluntary agreements, environmental labelling and product design guidelines.

Green Paper on IPP

To launch a broader debate on the role and possible measures that could be taken on the European Union level, the European Commission adopted a Green Paper on IPP on 7th February 2001.

The Green Paper on IPP presents ideas for strengthening product-focused environmental policies and assisting the growth of a market for greener products. The Green Paper examines the potential for the various stakeholders, i.e. those who are impacted by or have an interest in the issues, and suggests possible methods of implementation.

It was stated, that an integrated policy for products will probably need to be based on a mixture of the instruments, like:

- Getting the Prices Right (economic instruments, like differentiated taxation, state aid programmes)
- Stimulating Demand for Greener Products (through eco-labelling and green public procurement)
- Strengthening Green Production (through new approach and eco-design)

A new method for considering the life-cycle aspects suggested by the Green Paper was "Product Panels". These are groups of relevant stakeholders who seek to devise solutions to particular problems.

The Green Paper contained several questions on how IPP should be developed, both in terms of the overall approach and different instruments. Stakeholders were invited to submit comments to the Commission.

Most stakeholders welcomed the Green Paper and endorsed the new policy logic set out in IPP. The opinions on the merits of the various instruments were, however, more divergent.

Communication on IPP

Based on the results of the broad consultation process, the European Commission adopted a “Communication on Integrated Product Policy: Building on Environmental Lifecycle Thinking” on 18 June 2003 which already put the IPP policy approach explicitly in the framework of the Lisbon Strategy and the EU SDS, anticipating already the commitments made at the Johannesburg Summit 2002, especially those towards sustainable consumption and production.

Product Dimension Needed in Environmental Policy

Due to the controversial discussion on the outline of the IPP approach, and the demand for further clarification of the concept, the Communication re-iterates why a product dimension to environmental policy is needed, and explains the approach and the guiding principles of the EU’s IPP strategy, followed by a remaining sections outlining what the Commission will do to further the uptake of the IPP approach.

Change to Strategic Aims of IPP

Compared to the former understanding, presented in the Green paper, the European Commission changed slightly the strategic aims of an IPP approach. Within the Communication it was stated, that the IPP approach seeks to achieve:

- reduce negative environmental impacts from products
- combine improving of life styles and well-being - which are often directly influenced by products - with environmental protection and
- found win-win situations where environmental improvements and better product performance go hand in hand and
- where environmental improvements support long-term industrial competitiveness.

Life Cycle Approach for

The European Commission emphasised the need for a policy approach that is complementary to existing product-related environmental policies, such as

Product-Related Policy

industrial pollution or waste management issues, by looking at the whole of a product's lifecycle, including the use phase, to ensure that environmental impacts throughout the life-cycle are addressed in an integrated way – and so are not just shifted from one part of the life-cycle to another. The policy approach should also mean that environmental impacts are addressed at the point in the life-cycle where they will best and most cost-effectively reduce the overall environmental impacts and resource use.

Product Policy Aims

The European Commission specified the aim of the new policy approach in more detail related to product and market characteristics. Any product policy should aim to:

- reduce the environmental impacts of increased quantities of products
- be flexible in order to address many different product variations simultaneously
- use this creativity for the benefit of the environment as well as the economy
- take account of the global nature of trade and be in compliance with relevant international agreements, such as World Trade Organization rules
- ensure that producers and designers become more responsible for ensuring that their products fulfil agreed criteria on health, safety and the environment
- address the appropriate use and disposal of products
- improve information flows along the supply-chain.

From a Commission's point of view, all of these factors underlined the need to introduce a product dimension to environmental policy and provide a powerful supplement to existing product-related measures, while looking at products in a holistic way, involve as many actors as possible and leave to them the responsibility for the choices they make.

Principles for IPP Approach

To become recognised as being a potentially very effective way to address the environmental dimension of products, the European Commission further outlined five key principles which form the baseline for the IPP approach:

- life-cycle thinking (considers a product's life-cycle and aims for a reduction of its cumulative environmental impacts in the most cost-effective way for business and society)
- working with the market (mainly via incentives)
- stakeholder involvement (encourage to participate in their fields of influence and to cooperate between each other)
- continuous improvements (rather than setting a precise threshold to be attained)
- a variety of policy instruments (from voluntary initiatives to regulations, with a clear tendency to work with voluntary approaches and from the local to the international scale).

Objectives for IPP Strategy

Based on this concept framework, the European Commission draws up an EU's IPP strategy which tries to achieve the following objectives:

- to contribute to the environmental challenges identified in both the Sustainable Development Strategy and the Sixth Environment Action Programme and international commitments
- to supplement existing product-related policies, by providing a wider, "life-cycle", conceptual framework in which the ramifications for any other environmental problems can be considered
- to strengthening the co-ordination and coherence between existing and future environment-related product policy instruments and, therefore, help to exploit the potential synergies between them fully and to encourage

their integrated development.

NGO Views

Within the follow-up discussion on the Communication, some Member States and most Environmental and Consumer NGOs made critics on the relative openness of the objectives (with no specific IPP targets) as too weak to become IPP a strong driver for change. Contrary to these critics, The European Commission and the majority of Member States and stakeholder groups understood IPP more or less as a step-by-step learning process, building on experiences via improved implementation of the various tools and instruments, like EMAS or the EU eco-label, which were already revised in 2001 and 2000 under the auspices of the upcoming IPP strategy. The European Commission was aware of that achieving the overall objectives will take time and require strong and long-lasting commitment and cooperation from Member States and stakeholders, especially business, to bring IPP to a success. Additionally, the European Commission offered the opportunity to all stakeholders to continuous develop the IPP strategy in dialogue with them.

Implementation Steps

Within the Communication, the European Commission focused on two, interrelated, fields of action to move IPP forward, and outlines further steps of implementation:

- establishing the framework conditions for the continuous environmental improvement of all products throughout the production, use and disposal phases of their life-cycle
- developing a focus on products with the greatest potential for environmental improvement.

Here, the European Commission puts all the tools and instruments mentioned above in place which could be named as the „IPP toolbox“. Furthermore, the European Commission outlined specific measurements to be taken to further strengthen the implementation of these tools and formulates additional activities to support further co-ordination and integration.

Status of the Implementation of the EU's IPP Strategy

The Communication on IPP states that the European Commission should submit a report to the European Parliament and the Council on the progress made in the implementation of IPP in the European Union. The progress report to the European Parliament and the Council should be based on reports from Members States and stakeholders detailing the measures taken and progress made in implementing the IPP approach will allow the Commission and EU institutions to reflect on whether the nature and direction of IPP needs to be altered.

Working Group on IPP Reporting Formats 2005

Therefore, a working group on IPP Reporting Formats was set up in April 2005 to review the type of information that could be reported in light of the IPP Communication and to propose to the Commission an approach for collecting the necessary information for reporting. The work was carried out by the European Environment Agency and the European Topic Centre of Waste and Resource Management (now European Topic Centre on Sustainable Consumption and Production) in cooperation with the European Commission.

Working Group Final Report 2006

A final report by the working group was submitted to the European Commission in December 2006 which proposed an approach for collecting information to report the progress made of implementing IPP. Based on this proposal for progress reporting the European Commission launched a survey in spring 2008 among Member States on the state of implementation of IPP which covers a broad range of aspects, e. g. related to concept development, policy frameworks, institutional setup, and the IPP toolbox. The results of the survey were distributed and discussed (e. g. within the IPP regular meeting) in summer 2008, and form now the

baseline of the progress implementation report currently developed by the European Commission for final delivery to the European Parliament and the Council by autumn 2009.

Conclusion

The development of an IPP approach on the European Union level and within Member States should be seen as foundation towards a more systematic SCP approach, which will be outlined in the next section.

Further Information

Information on the various activities within the IPP approach:
http://ec.europa.eu/environment/ipp/

2.4.6 From IPP towards SCP policy in the EU: the EU Action Plan on Sustainable Consumption and Production and Sustainable Industrial Policy

Introduction

In this Section of the Module

After outlining the evolution of various policy frameworks and approaches in the field of environmental policy in the European Union, this section provides an insight of the new European Union's core strategy and framework on sustainable consumption and production and sustainable industrial policy, in which also the EU eco-label is placed as one of the strategic cornerstones'.

Launch of Action Plan on SCP/SIP 2008

Based on current (negative) trends in the overall progress of the European Union to achieve the goals of sustainable development, and facing the various challenges to integrate environmental sustainability with economic growth and welfare by decoupling environmental degradation from economic growth on the one hand, and by the same time, to deal with the consequences of climate change and the growing demand for natural resources, therefore, the European Commission launched an Action Plan on Sustainable Consumption and Production and Sustainable Industrial Policy (SCP/SIP) on 16 July 2008.

Content of Action Plan

The Action Plan includes a series of policy proposals on sustainable consumption and production that will contribute to improving the environmental performance of products and increase the demand for more sustainable goods and production technologies. It also seeks to encourage EU industry to take advantage of opportunities to innovate.

The Action Plan is part of the European Union's renewed Sustainable Development Strategy (EU SDS) which reinforces the EU's long-standing commitment to meet the challenges of sustainable development and builds on initiatives and instruments at EU and international level such as the United Nations' Marrakech process.

The Council endorsed the Action Plan in its conclusion on 4 December 2008.

The Action Plan outlines

- challenges
- objectives
- fields of action and supporting measures
- outlook and roadmap
- list of policy and legislative proposals associated with the Action Plan.

Challenges

From an European perspective the Action Plan outlines the following key challenges as crucial to overcome in the future:

Challenge 1

The way we produce, use and dispose of goods is unsustainable and is rapidly depleting our planet's natural resources.

Fact: If people in the rest of the world lived European lifestyles it would take the resources of two and a half planets to support them.

Explanatory note: Europe has enjoyed unprecedented levels of prosperity in recent years: more jobs, stable economies, low unemployment and high (labor) productivity. But a healthy environment is essential if the strength and competitiveness of the economy is to be maintained. Continued economic growth, changes in lifestyles and the increasing use of technologies have resulted in ever-greater demand for products and services.

Challenge 2

Our quality of life, prosperity and economic growth depend on living within ecological limits.

Fact: Energy consumption in the EU is likely to increase by 9 % between 2005 and 2020.

Explanatory note: The products we buy and use every day have a significant impact on the environment, from the materials used in their production, to the energy needed to use them and the waste they create once obsolete. If modern society is to be sustainable in the long term, products that cause the least environmental impact need to become the accepted standard in all sectors.

Challenge 3

The EU is committed to sustainable development, growth and jobs. Achieving this means promoting better products, more efficient production methods and improved consumption patterns.

Fact: Households in Europe are major contributors to environmental problems such as climate change, air pollution, water pollution, land use and waste.

Explanatory note: Although environmental awareness is increasing, most people find it difficult to relate their personal consumption habits to large-scale problems such as climate change. To reverse current unsustainable trends, consumers need to be well informed, empowered and feel that their actions make a difference.

Challenge 4

Governments, businesses and individual citizens need to take action in order to create more sustainable societies.

Fact: The way we produce goods and the efficiency of the products we use has a direct link to the challenges of climate change and the use of natural resources.

Explanatory note: Policies across the EU have been relatively successful in cleaning up industrial production and encouraging more efficient processes, bringing reductions in pollution and waste and higher levels of recycling. However, more needs to be done to promote the concept of materials efficiency and propel the most innovative eco-technologies into the mainstream.

Challenge 5

The global nature of modern economies calls for policies that also address the impacts of EU lifestyles in other parts of the world.

Fact: If current patterns of consumption continue, it is estimated that global resource use would quadruple within 20 years.

Explanatory note: The number of consumer goods and industrial supplies imported into Europe has increased significantly in recent years. Materials are extracted and processed in other parts of the world and then transported to

European countries — all with negative environmental effects. Often, the producing areas are developing countries which are the least able to deal with the mounting pressures on the environment. In addition, many of the producer countries, such as China, India, Brazil and others, are growing rapidly, both economically and in population number. As these countries become more prosperous, their demand for resources and energy increases. If these countries continue to adopt the established western patterns of consumption, the environmental pressures will increase even more dramatically.

Objectives

Related to the identified key challenges the Action Plan provides a dynamic framework for various overall policy objectives:

- Objective 1: to improve the energy and overall environmental performance of products throughout their life-cycle
- Objective 2: to promote and stimulate the demand of better products and production technologies
- Objective 3: to help consumers to make better choices through a more coherent and simplified labelling.
- Objective 4: to achieve leaner production
- Objective 5: to address the international aspects.

Fields of Action

Related to the identified challenges and objectives the Action Plan outlines three fields of action while each of them specify concrete proposals and measures to be taken:

- dynamic framework for better products and smarter consumption
- cleaner and leaner production
- global/international dimension.

Better Products and Smarter Consumption

A range of policies are already in place to improve the energy and environmental performance of products, like:

- the Ecodesign (EuP) Directive establishes a framework for setting ecodesign requirements for energy-using products.
- A number of other pieces of legislation address specific aspects of the life-cycle of products, such as waste.
- The labelling schemes set by the Energy Labelling Directive, the Energy Star Regulation, the Eco-label Regulation and other schemes developed by Member States, retailers and other economic operators provide consumers with information on the energy and environmental performance of products.
- Incentives and public procurement are being implemented by Member States to stimulate the better performance of products.
- The Energy Star Regulation also obliges EU institutions and Member State authorities to purchase office equipment meeting specific levels of energy efficiency.

Shortcomings Hampering the Potential of Policies

However**,** a number of shortcomings are hampering the potential of these policies:

- most product legislation addresses only specific aspects of a product's life-cycle
- while the Ecodesign Directive takes a life-cycle perspective, the environmental impact of energy-using products currently covered by the Directive only account for 31-36% of the environmental impact of products
- information to consumers under EU policy has focused on energy efficiency for household appliances and office equipment under the

Energy Labelling Directive and Energy Star Programme, or has covered only a limited number of products (under the EU eco-label). Finally, actions at national level are not coordinated
- overall, voluntary and regulatory instruments are not sufficiently connected and potential synergies between the different instruments are not exploited
- implementation is not sufficiently dynamic and forward-looking to drive the performance of products upwards
- divergent national and regional approaches send conflicting signals to producers, and as a result the full potential of the Internal Market is not realized.

New Policy Approach in Action Plan

Therefore, the new policy approach outlined in the Action Plan integrates the potential of the different policy instruments, implementing them in a dynamic way. This "integrative" approach will be further below.

The Action Plan comprises the following actions in this field:

Eco design

Ecodesign, minimum standards, and advanced benchmarks for products:
- The scope of the Directive on the Ecodesign of energy-using products will be extended to cover all energy-related products.
- Minimum requirements will be set for products with significant environmental impacts, focusing on key environmental aspects.
- To provide markets with information on best performing products, advanced benchmarks of environmental performance will also be identified.
- Periodic reviews of minimum requirements and advanced benchmarks will take place to adapt them to technological change and provide businesses with a long-term perspective of future regulatory environment.

Product Labelling

Product labelling under the Energy Labelling Directive and Eco-label Regulation will be further developed and, following a review of the Ecodesign Directive in 2012, complemented as appropriate by an Ecodesign Labelling Directive to provide consumers with information about the energy and/or environmental performance of products.

Public Procurement and Incentives

The energy efficiency and environmental criteria under the above schemes will be used to establish a harmonised base for public procurement and incentives provided by the EU and its Member States. This would overcome the current fragmentation of stimuli and incentives in the Internal Market.

Smarter Consumption

A range of other actions to arrive at smarter consumption will also be undertaken. In particular, action will be implemented with retailers and producers of products to "green" their own activities and supply chains, as well as raising the awareness of consumers at large and increasing their proactive role.

Cleaner and Leaner Production

The regulatory framework for production processes is well established at European level. This includes regulatory settings such as on environmental emissions from industries (IPPC Directive) and the Emissions Trading Scheme for GHG.

However, there is a need to give further impetus:
- to resource efficient and eco-innovative production processes
- to reduce dependency on raw materials and
- to encourage optimal resource use and recycling.

In the Action Plan a set of integrated actions are proposed to work in synergy with and complement the policy for smarter consumption and better products by extending, amplifying and accelerating its impact:

Boosting Resource Efficiency

Further tools will be developed to monitor, benchmark and promote resource efficiency, taking into account a life-cycle perspective and including trade.

Detailed material-based analysis and targets will be addressed at a later stage, based on environmental significance and on access to natural resources.

Explanatory note: Resource efficiency contributes to the goal of creating more value while using fewer resources. In the EU, resource productivity (measured by GDP per resource use, €/kg) has improved 2.2% per annum in real terms over the past 10 years. This means that the EU has been able to stabilise resource use in the growing economy, largely due to efficiency improvements in production as well as an increasing role of services in the economy. Improvements in resource productivity should continue at least at the same pace as this EU average.

Supporting Eco-innovation

Tools will be developed to monitor, benchmark and boost eco-innovation and its uptake in the EU, as part of a wider EU research and innovation policy and its instruments.

An EU wide environmental technology verification scheme will be established to provide reliable third-party verification of the performance and the potential impacts on the environment of new technologies. It will be a voluntary, partially self-financed scheme, based on a regulatory framework. It will help to provide confidence for new technologies emerging on the market.

Explanatory note: Innovation in the area of environmental goods and services is central to the successful implementation of this Plan, and plays a key role in innovation policy. One of the available indicators to measure the level of innovation is the number of patents in a certain area. According to the OECD, the eco-innovation patents in the EU are on rise and best performing Member States have been granting annually 3.5 patents per billion GDP (in Euro).

Enhancing the Environmental Potential of Industry

Revise EMAS Regulation: The Community eco-management and audit scheme (EMAS) helps companies to optimise their production processes, reducing environmental impacts and making more effective use of resources. EMAS operates as a voluntary eco-management and audit scheme. In order to fully tap its potential for improving resource efficiency of production processes, the scheme will be significantly revised to increase the participation of companies, and reduce the administrative burden and costs to SMEs.

Developing industrial policy initiatives for environmental industries: To further the competitiveness of environmental industries and favour their uptake by traditional industries, initiatives for environmental industries will be developed. These initiatives are part of the implementation of the industrial policy of the European Commission. For this purpose, a comprehensive screening of regulatory barriers and market failures that hamper the competitiveness of environmental industries and their uptake by other sectors of the economy will be carried out. This will address issues such

- the Internal Market and Better Regulation,
- standardisation and
- access to finance.

The potential of Information and Communication Technologies to deliver sustainable solutions will be explored.

Specific attention will be given to priority areas identified by the Lead Market Initiative.

Special Focus on SMEs

Lack of information, insufficient expertise and scarcity of financial and human resources make it difficult for SMEs to fully exploit the business opportunities offered by a sound environmental management. Between 2005 and 2007, the Commission introduced a number of policy measures to support European SMEs, including the improvement of their environmental performance. Further measures were included in the Communication for a 'Small Business Act' for Europe. Notably, the Enterprise Europe Network will contribute to raise awareness and disseminate know-how and expertise gained through other EU programmes and initiatives in the field of environment and energy.

Global Markets for Sustainable Products

In addition to the main lines of action described above, further activities at a global level will be carried out.

This will build on existing initiatives such as

- the Thematic Strategy for the Sustainable Use of Natural Resources
- the Global Energy Efficiency and Renewable Energy Fund and
- the Forest Law Enforcement Governance and Trade Regulation.

In addition to these actions the European Commission will undertake to:

- promote sectoral approaches in international climate negotiations as an element of and complement to comprehensive international climate change agreement for the period after 2012.

Explanatory note: Government and industries are starting to develop sectoral approaches and commit to specific emission or energy-efficiency benchmarks. This will allow developing countries to take action in specific sectors which could reduce the growth of emissions so that sectoral emission will deviate substantially from sectoral baseline. It will also help industry curb emissions, and potentially address concerns of carbon leakage. The European Commission will support the development of such approaches in the context of future international negotiation on climate change. Activities will include capacity building in key emerging economies and determining key elements needed to build sectoral approaches into the post 2012 UN climate framework.

Promote Good Practice Internationally

Sustainable Consumption and Production policies will be promoted, as part of the United Nations Sustainable Consumption and Production 10-Year Framework of Programmes (Marrakesh Process). Additional action will strengthen partnerships, such as through the EU-Asia partnership (SWITCH Programme) and support international roundtables and panels. In addition, at the initiative of the European Commission and the G8 countries, along with China, India and South Korea, took the decision to jointly establish the International Partnership for Cooperation on Energy Efficiency ("IPEEC").

Promote International Trade in "Environmentally-Friendly" Goods and Services

Liberalisation of trade in environmental goods and services can help disseminate green technology and thus support the adaptation to a low-carbon economy while building on and further developing European competitiveness in environmental sectors. The EU is continuing its efforts to liberalise trade in environmental goods and services in WTO negotiations under the Doha Development Agenda, and in the context of bilateral trade negotiations. This should take place, wherever possible, on the basis of international standards. The Ecodesign Directive will develop environmental and energy efficiency standards for a number of products. This can pave the way to the adoption of international standards and help create export markets for leading European companies. Trade policy and industrial dialogue should contribute to this process.

Roadmap and Status of Implementation

Beside the Action Plan, the European Commission proposed the following legislation and documents which are accompanied to the Action Plan and are in the process of negotiation/adoption (note: most of the proposals will be finally adopted be end of 2009):

- Proposal for the extension of the Ecodesign Directive
- Proposal for the revision of the Eco-label Regulation
- Proposal for the revision of the EMAS Regulation
- Communication on Green Public Procurement
- Proposal for the revision of the Energy Labelling Directive
- Proposal for a Regulation for an Environmental Technology Verification scheme (announced by European Commission).

The proposed EU Retail Forum on SCP was constituted in March 2009 and is co-chaired by the European Commission and Metro AG. A work programme was decided on the second meeting of the EU Retail Forum in June 2009.

As stated in the Communication, the outcomes and results of the Action Plan will be reviewed by the European Commission in 2012.

Other European Commission Activities

Other activities of the European Commission which were not explicitly mentioned in the Action Plan but are in line with the objectives:

- discussion on the development of a European carbon footprint approach
- further elaboration of the use of economic instruments.

Explanatory note: It should be mentioned that the IPP related activities and measurements which were explained above are still in place. The European Commission and the Member States are currently discussing options to re-arrange the institutional setting of IPP and SCP, e. g. to further develop the mandate of the IPP regular working group towards a wider IPP/SCP working group. A proposal will be made by the European Commission in line with the upcoming IPP Implementation Progress Report, which will be published by autumn 2009.

Further Information

The EU Action Plan on Sustainable Consumption and Production and Sustainable Industrial Policy is part of the Module A Resource Materials as an electronic document (Resource 1).

Further information on the Commission's activities in this field:
http://ec.europa.eu/environment/eussd/escp_en.htm

How the dynamic framework for better products will work

The challenge of the outlined SCP Action Plan is to better integrate various policy instruments, while increasing their synergy towards a more dynamic framework for better environmental product performance at the market place.

In principle, the measurements and instruments (Ecodesign, Energy Labelling, EU eco-label, green public procurement) should be organised in such a way to:

- exclude the "bad" performance
- promote the "good" performance
- safeguard continuous improvements.

Therefore, the recast of the Ecodesign Directive, the revised Energy Labelling Directive, the revised EU eco-label Regulation and the Communication on Green Public Procurement will be re-directed to provide

- minimum requirements
- performance benchmarks
- periodic updates of requirements and benchmarks (dynamisation)

- incentives
- broader scope of application.

With this dynamic framework, the European Commission intends to promote the "push-and-pull"- factors via mandatory and voluntary approaches to stimulate the transformation of markets to become "green". Here, the EU eco-label is clearly positioned as "label of excellence" to cover only the best performing products on the markets.

2.5 EU Eco-label

2.5.1 Introduction

Development of the EU Eco-label

Current Status

As shown in the chapter before, the EU eco-label is nowadays a central part of a wider SCP policy framework and an important policy instrument to support achieving various environmental policy objectives in the European Union.

Initiation of EU Eco-label

Related to the status of today, the setup of the EU eco-label scheme was not a straight forward process of implementation: the first idea of an EU eco-label was introduced in 1987 (as part of the first European Year for the Environment which is now celebrated every year on the 5th June in all the Member States in the European Union), but it took another two years or so to setup a first proposal by the European Commission to be consulted with the Member States and the European Parliament officially, which took additional three years to become formerly adopted and came into force as new regulation in 1992.

From Stand-Alone Instrument to Environmental Policy "Front-runner"

At this date, the EU eco-label was more or less a „stand alone" instrument in the field of product related environmental policy and the promotion of sustainable consumption patterns, anticipating already the political challenges and the need for a more systematic and integrative policy approach which were be outlined in the AGENDA 21 at UNCED 1992 (Chapter 4) and further consolidated in a variety of strategic policy proposals of the European Commission, like the Integrated Product Policy (first discussed at the Council meeting in May 1999), or the newly introduced EU Action Plan on Sustainable Consumption and Production and Sustainable Industrial Policy, which was launched by the European Commission in July 2008.

It is evident, that due to the „innovative and multi-dimensional character" of the policy instrument „eco-label", which is basically founded on the principles of modern environmental policy, like governance structure, pre-cautionary, cooperative and participatory, the EU eco-label (but also the existing national eco-label schemes, like the German Blue Angel or the Nordic Swan) was a „frontrunner" to pave the way to several important policies, like climate change and energy efficiency, health and hazardous substances, use of natural resources and waste (including recycling), eco-design and so on.

Related to the increased importance of environmental policy in the modernisation of the European Union and the global challenges which came up during the 1990ties, the political environment (or landscape) of the EU eco-label changed drastically compared to the former times in such a way, that the development and implementation of the EU eco-label has become more and more influenced by interests and objectives of other environmental and non-environmental areas, which evolved as own fields of action within environmental policy and policy for sustainable development over time.

Why an Own EU Eco-label

Change in Orientation of Environmental Policy

Within the political debate on a new orientation of environmental policy in the European Union starting by mid of the 1980ies (especially after the Chernobyl disaster in 1986) it has become clear that to overcome the implementation gap within environmental policy a new type of policy was needed to be established in the European Union. This re-orientation emerged through the fact, that the legislative approach alone does not lead either towards the protection of the environment nor towards the challenges of sustainable development.

5th Environmental Action Programme

As outlined in the 5th Environmental Action Programme ""Towards Sustainability" (1993-2000), the new "philosophy" of the European Union's approach towards environmental policy and sustainable development could be characterised as follow:

- adoption of a global, proactive approach aimed at the different actors and activities which affect natural resources or pollute the environment
- the will to change current trends and practices which harm the environment for current and future generations
- encouraging changes in social behaviour by engaging all the actors concerned (public authorities, citizens, consumers, enterprises, etc.)
- establishing the concept of shared responsibility and
- using new environmental instruments.

From "Command and Control" to "Shared Responsibility"

Regarding to the introduction of new instruments, a move away from a "command-and-control" approach towards "shared responsibility" between government, industry, and the public was considered to be necessary to achieve progress towards sustainability. Therefore, the launch of an EU eco-label and the adoption of the first EU eco-label regulation (EEC) 880/1992 could be seen as:

- response to these new challenges of environmental policy making and at the same time
- institutionalised "prototype" of this new policy approach on the level of the European Union.

Other Trends Leading to EU Eco-label

Explanatory note:

Within political science, there is some evidence that additional trends and developments have led towards the setup of an EU eco-label scheme in 1992 which could be summarized as follow:

- Increased health risk perception of the public on contaminated products fuelled by the discussion on radio-active contamination caused by the Chernobyl emergency
- Need of an voluntary approach to complement the legislative approach of the European Union to overcome the implementation gap of existing environmental legislation (like waste, chemicals) and to stimulate business, civil society and consumers to become active involved to reach sustainable development within the European Union as response to the commitments made by the European Union at UNCED 1992
- Need to develop an harmonised approach of environmental product standards within the European Union to reach the objectives of the internal market (competition, access to markets, free flow of goods and services)
- Need to overcome the evolving split-up of national initiatives to create eco-labelling schemes (like Blue Angel, but especially the Nordic Swan in 1989 as first multi-national eco-labelling scheme was a strong impetus)
- Stimulate discussion in the Member States to develop innovative and compatible policy frameworks for environmental policy and better policy integration into sectoral policies.

2.5.2 Legal status and institutional setting of the EU Eco-label

Background

Voluntary Approach and the EU Treaty

The discussion in the preparation period before the adoption of regulation 880/1992 was mainly focused on the question on how to integrate the "voluntary approach" (and the associated governance structure) of eco-labelling in the existing "legislative corset" (the Treaty) of the European Union and how to organise the proper implementation of the scheme, either on EU and Member State level. The discussion shows that this was a challenging and often controversial question for all European Union's institutions and the Member States which last until today.

Constitutional Aspects

Behind this background the following aspects should be considered as important for the constitution of the EU eco-label:

- the requirement for a clear legal framework as baseline for the political "legitimacy" and the "mandate to act"
- the definition of ownership
- decision making procedures related to the political, managerial and technical dimensions of eco-labelling
- the build-in of the consultation process with stakeholders to safeguard the needed acceptance and support
- various roles of institutions on the EU (especially the Commission) and Member State level to safeguard proper financing and implementation.

Out of these aspects, the legal and institutional setup of the EU eco-label was formed as a very "complex hybrid" between the traditional legislative approach of the European Union and the voluntary framework approach of eco-labelling, which was dominantly established at that time in many countries, like in Germany; Scandinavia, and Japan.

Therefore, the regulation (EEC) 880/1992 and the revised regulation (EC) 1980/2000 on the EU eco-label reflects this complexity which will be further outlined in the next step.

Regulatory Baseline

Within the current stage the EU eco-label is based on the following legislative package and decisions:

- Regulation (EC) 1980/2000 on the EU eco-label (this regulation is result of the political decision making process between the European Commission, the European Parliament and the Council and forms the legal framework). A copy of this Regulation is in the Module A Resource Materials (Resource 2) and is included as a hard copy in the Handbook.
- Co-decisions to the regulation related to:
  - EU Eco-labelling Board
  - Consultation Forum
  - Fees
  - Standard contract
  - EU Eco-label working plan

The co-decisions are part of the regulatory framework of the EU eco-label which outlines procedures and related aspects in more detail. The co-decisions should be considered as important as the regulation itself because it forms the baseline for a common understanding on the strategic and operational objectives and on a harmonised approach towards the implementation of the EU eco-label in all 27 EU Member States and the 4 EEA countries (Lichtenstein, Switzerland, Norway, and Iceland).

Explanatory note: Provide all experts with a set of these documents. Use the documents of the co-decisions as further explanation to the various articles in the regulation.

Explanatory note: All documents related to the legal status of the EU eco-label are available at the Commission's website:

http://ec.europa.eu/environment/Eco-label/about_Eco-label/documents_en.htm

EC Regulation 1980/2000 on the EU Eco-label

Preamble

The preamble of the regulation (EC) 1980/2000 outlines an overview of the political aims and principles of the EU eco-label and the important features of the regulation. Within the 19 paragraphs the preamble also reflects some of the important changes made within the revision of the first regulation 880/1992 and stressed points of further improvements to increase the effectiveness of the scheme.

Explanatory note: The preamble of the regulation could be used as kind of overall summary to characterise the EU eco-label.

Objectives and Principles (Article 1)

Article 1 of the regulation outlines the objectives and principles of the EU eco-label and defines basic requirements for the application of the EU eco-label scheme related to Community law and other important decisions in the field of environmental policy.

The Objectives

The objectives of the EU eco-label award scheme are to:

- promote products which have the potential to reduce negative environmental impacts, as compared with the other products in the same product group, thus contributing to the efficient use of resources and a high level of environmental protection and
- provide guidance and accurate, non-deceptive and scientifically based information to consumers (including professional purchasers) on such products (application means either goods or services).

The Principles

It is stated, that these objectives shall be pursued through the following principles:

- environmental impacts of products shall be identified on the basis of an life-cycle approach
- safeguard participation at all life stages of a product or service where appropriate
- applying the pre-cautionary principle
- comply with Community law, objectives and instruments
- co-ordinate with other labelling initiatives of the EU, like Energy Labelling scheme or the Organic Agriculture scheme.

Explanatory Note on Environmental Focus

The regulation stressed explicitly only the environmental aspects (like energy and use of resources) of products. In the political communication the objectives of the EU eco-label are set to some extend broader, like health related impacts of products which are associated with environmental related impacts (e.g. chemicals). The health related impacts of products are explicitly mentioned under Article 2 (4) (scope), where it is stated, that the EU eco-label may not be awarded to substances or preparations classified as very toxic, toxic, dangerous to the environment, carcinogenic, toxic for reproduction, or mutagenic in accordance with Council Directive 67/548/EEC or Directive 1999/45/EC of the European Parliament and of the Council nor to goods manufactured by processes which are likely to significantly harm man and/or the environment, or in their normal application could be harmful to the consumer.

Related to the positioning of national eco-label schemes, like the Blue Angel or

the Nordic Swan, the EU eco-label is much more positioned as a purely "environmental label" which caused some problems in the past to setup a wider scope of criteria or to use other "claims" for the positioning of the EU eco-label in marketing communication. At the current stage, social aspects are not covered by the EU eco-label, but this will change in the future under the upcoming new regulation.

Scope

(Article 2)

In this article the regulation outlines requirements and exemptions for the application of the EU eco-label for products (goods and services) and provides some specifications on the term "product group" which should be used as guidance to identify priorities areas within the EU eco-label.

What can have the EU Eco-label

In general, the EU eco-label may be awarded to:

- products (goods and services) available in the Community which comply with the essential environmental requirements (Art. 3) and the eco-label criteria (Art. 4).

What cannot have the EU Eco-label

The eco-label my be not awarded to:

- substances and preparations classified as very toxic, toxic, dangerous to the environment, carcinogenic, toxic for reproduction, or mutagenic in accordance with Council Directive 67/548/EEC or Directive 1999/45/EC of the European Parliament and of the Council
- nor to goods manufactured by processes which are likely to significantly harm man and/or the environment, or in their normal application could be harmful to the consumer
- food
- drink
- pharmaceuticals
- nor to medical devices as defined by Council Directive 93/42/EEC, which devices are intended only for professional use or to be prescribed or supervised by medical professionals.

Product Criteria Needed

Awarding the EU eco-label for products therefore is only possible, if criteria are developed for the respective product group, whereby the term product group means:

- any goods or services which serve similar purposes and are equivalent in terms of use and consumer perception.

Conditions for Selected Product Groups

To identify the most important product groups to be covered by the EU eco-label scheme, the regulation outlines some further conditions which a selected product group must fulfil:

- it shall represent a significant volume of sales and trade in the internal market
- it shall involve, at one or more stages of the product's life, a significant environmental impact on a global or regional scale and/or of a general nature
- it shall present a significant potential for effecting environmental improvements through consumer choice as well as an incentive to manufacturers or service providers to seek a competitive advantage by offering products which qualify for the eco-label and
- a significant part of its sales volume shall be sold for final consumption or use.

The regulation stressed also the possibility, that a product group should be

subdivided into sub-groups where appropriate.

Explanatory Note on Selection of Product Groups

Beside the exemptions, the regulation opens the possibility to award the eco-label to (potentially) every product which is available at the Community market. But due to financial and administrative restrictions within the eco-label system there is a tendency to prioritise the application of the EU eco-label towards product groups. Here, the European Commission and the Member States developed over the time a some kind of a “rationality” (set of selection criteria) to identify the most important product groups to be covered by the EU eco-label (which mounted e. g. in a prioritisation study within the framework of the working plan). Due to the fact, that some product groups developed under the eco-label scheme were not recognised and used by companies, it has become clear, that a methodology was needed to identify strategic success factors and a more rational and systematic product group planning approach to safeguard the best allocation of resources and capacities by increasing the effectiveness and outreach of the EU eco-label at the market (see here the role of strategic product group planning for marketing activities and public procurement purposes e.g. in the working plan under article 5).

Environmental Requirements (Article. 3)

Article 3 of the regulation specifies the application of the EU eco-label and gives further guidance for the selection process of product group planning and criteria development. Therefore, article 3 is strongly associated with the indicative assessment matrix outlined in Annex I (which identifies key environmental aspects related to the different stages of the product/service life-cycle) and the methodological requirements for criteria development outlined in Annex II (which specify the approach to setup the process of criteria development) of the regulation.

Proving Feasibility for Developing Criteria

Based on a life-cycle assessment the following provisions shall apply while proving the feasibility of the development of criteria for a new product group to be included under the EU eco-label scheme:

- evaluate the comparative improvements (net environmental balance between the environmental benefits and burdens including health and safety aspects; economic aspects are explicitly not mentioned at this point but under Art. 4)
- identify categories of key environmental aspects where the product under examination provides the most significant contribution from a life-cycle perspective
- take into account the pre-production phase (extraction or processing of raw materials and energy production) where technically feasible.

4 Steps to Set Criteria

As outlined in Annex II of the regulation, the process of identifying and selecting the key environmental aspects as well as setting the eco-label criteria include the following steps:

Step 1: Feasibility and Market Study

The feasibility and market study considers the various types of product groups in question on the Community market and covers aspects like: production volumes, imports, sales, structure of the market, internal and external trade aspects, consumer perception, and functional differences between types of products.

Step 2: Life Cycle Considerations

Key environmental aspects for which criteria will need to be developed will be defined through the use of life cycle considerations, and will be performed in accordance with internationally recognised methods and standards (like EN ISO

(LCC)	14040 and ISO 14024), where appropriate.
Step 3: Improvement Analysis	The improvement considerations will take into account in particular the following aspects: the theoretical potential for environmental improvement in conjunction with possible changes induced in the market structures (like technical, industrial and economic feasibility and market modifications, consumer attitudes, perceptions and preferences, which may influence the effectiveness of the eco-label).
Step 4: Proposal of the Criteria	The final ecological criteria proposal will take into account the relevant environmental aspects related to the product group. Explanatory note: The procedure to setup ecological criteria within the EU eco-label scheme will be presented in more detail under the procedures of article 6.
Principles for Developing Criteria (Article 4)	Article 4 of the regulation outlines basic requirements and principles for the development of criteria which form a baseline to structure criteria documents: • product group definition • criteria and requirements of the key environmental aspects which a product must fulfil in order to be considered for the award of an eco-label • criteria for fitness of use • requirements of assessing the compliance of the criteria • requirements for the verification of the criteria • specifications for the environmental information (article 8) • period of validity of the criteria • revision of the criteria • (in some cases also the applied fee structure for the product group – see under article 12). Explanatory note: The basic requirements to setup a criteria document will be exemplified in more detail in module B related to each of the product groups in focus. Explanatory note: The procedure to setup criteria for a specific product group will be outlined in detail under article 6.
Selectivity	Related to the level of ambition of the ecological criteria the regulation mentions the need to take the (potential) market penetration of the products into account and calls for a selectivity within the criteria development process which cover the following aspects: • the product's prospects of market penetration in the Community shall, during the period of validity of the criteria, be sufficient to effect environmental improvements through consumer choice • the selectivity of the criteria shall take into account the technical and economic feasibility of adaptations needed to comply with them within a reasonable period of time and • the selectivity of the criteria shall be determined with a view to achieving the maximum potential for environmental improvement. Explanatory note: There is a long discussion within eco-labelling on how to determine the level of ambition related to criteria development. Within some national eco-labelling schemes, like the Blue Angel in Germany, there is a "guiding principle" to setup the level of criteria in line with the best performing products available at the market which relates to a market share between 15-20%. Due to the specific characteristics of each product group this "guiding principle" does not apply automatically and requires a balanced decision between ambition level, market penetration and the potential for future take-up of the eco-

label. Within the revision of the current regulation there was some strong opinion towards the further development of the EU eco-label towards a “label of excellence” which means that the EU eco-label should apply in the future only for products with the best environmental performance at the market (see model as explained under 2.4).

Requirement for a Working Plan

(Article 5)

The regulation provides that the European Commission after consultation with Member States and stakeholder groups in the EUEB is to establish an EU eco-label working plan within one year after the regulation 1980/2000 has become into force. The working plan was introduced as important strategic planning tool within the EU eco-label scheme.

Content of Working Plan

The regulation sets out that the working plan shall include a longterm policy and strategy for the development of the EU eco-label scheme for a time period of 3 years which outlines:

- objectives for the environmental improvement and the market penetration which the scheme will seek to achieve
- a non-exhaustive list of product groups which will be considered as priorities for Community action
- plans for coordination and cooperation between the EU eco-label and other eco-label award schemes in Member States.
- the development of joint actions to promote products awarded the EU eco-label
- the creation of a mechanism for the exchange of information on existing and future product groups at national and at European Union level
- measures for the implementation of the strategy
- the planned financing of the Scheme
- the services to which the Scheme is not applicable (taking into account the Regulation of the European Parliament and of the Council allowing voluntary participation by organizations in a Community eco-management and audit system (EMAS).

First Working Plans

The first EU eco-label working plan was published in January 2002 for the time period 2002-2004. A (slightly) revised working plan for the time period 2005-2007 was adopted in February 2006 and officially published in June 2006.

As stated in the second working plan the fundamental aim of the working plan is to build on the lessons and experience obtained from the functioning of the eco-label scheme and lay down the programme of work for the time period 2005-2007 aiming at the following:

- make the Community Eco-label a more successful and effective instrument for improving the environmental quality of goods and services
- focus on supporting the currently on-going evaluation of the eco-label Scheme and the upcoming revision of the regulation
- continue the contribution to making consumption more sustainable, and to the policy objectives set out in the Community’s Sustainable Development Strategy and the Sixth Environmental Action Programme
- make the most effective use of the resources allocated to the scheme by the Commission, the Member States and the members of the European Union Eco-Labelling Board (EUEB).

Specific Objectives of the Working Plan

Related to the requirements set out by the regulation, the working plan outlines specific objectives and actions to be taken by the European Commission and the members of the EUEB in the following 5 sections and 1 annex:

- policy and strategy

- environmental improvements and market penetration
- co-operation, coordination and linkages between the EU scheme and other Type I eco-label schemes in the Member States
- joint actions on promotion
- planned financing of the scheme
- annex on non-exhaustible list of priority product groups to be covered by the scheme.

Explanatory note: Use the working plan to exemplify in more detail objectives and fields of action within the EU eco-label (e.g. product group development, marketing, linkages to other policy tools like green public procurement and EMAS).

EU Eco-label Management Groups

The preparation and further development of the overall strategy for the EU eco-label is supported by three management groups within the EUEB:

- policy management group (led by UK; not active at the moment)
- marketing management group (led by Italy and the Commission with support of the EU eco-label helpdesk; active, meet three times a year)
- co-operation and coordination management group (led by Czech Republic; not active at the moment).

Explanatory note: For further information on the mandate and objectives of the management groups please see: http://ec.europa.eu/environment/Eco-label/about_Eco-label/who_does_what_en.htm#management

Procedures to Set Criteria (Article 6)

The regulation outlines under article 6 in accordance with annex II and annex IV the various procedures for the setting of eco-label criteria which could be seen as core element of the decision-making procedure within the EU eco-label scheme. The basic steps are outlined below.

The 10 Steps

Step 1: European Commission in consultation with the EUEB identify and decide on priority product groups to be covered by the EU eco-label scheme (in accordance with the objectives and priorities outlined in the working plan).

Step 2: After decision in the EUEB on the priority product groups and the allocation of needed funding for the technical work, the European Commission officially gives a mandate to the EUEB to develop ecological criteria for a specific product group in accordance to article 3 and 4 and annex II of the regulation.

Step 3: European Commission introduces a tendering process on the technical work to be done and select the lead competent body to organise the work.

Step 4: The lead competent body setups a technical working group (so called “ad hoc working group”) which consist of members of the EUEB, the Consultation Forum, industry and others (e.g. researcher) to develop a proposal for a set of criteria for a specific product group in line with the procedures and principles outlined in annex II and annex IV of the regulation (feasibility and market study, life-cycle consideration, analysis of improvements, proposal of criteria).

Step 5: The lead competent body provides the results of the preparation phase and the proposal of criteria to the EUEB for further discussion and consultation (this might take several rounds of discussions and consultation to reach a final proposal of criteria).

Step 6: To prepare the final decision on the proposal of criteria within the Regulatory Committee (see under article 17), the European Commission setups a so-called “Inter-service- Consultation Process” to consult with all the other General Directorates of the Commission towards a common position of the draft criteria.

Step 7: Based on the Commission's common position on the draft criteria, the criteria are finally discussed and approved in the EUEB.

Step 8: The final draft of criteria will be delivered to the Regulatory Committee by the European Commission for final voting.

Step 9: After a positive vote by the Regulatory Committee the European Commission adopts the final criteria as Commission's decision.

Step 10: The final criteria for a specific product group comes into force after publishing in the Official Journal of the European Communities by the European Commission (which also includes the translation of the criteria document into all European Union's languages).

Notes on Procedures to Develop Criteria

Experiences show, that this process of criteria development might take between 2-3 years.

Due to the importance of these procedures within the EU eco-label scheme, which also include the legal aspects and the complex decision-making process, please study the regulation very carefully here. A flow-chart of this procedure is available under http://ec.europa.eu/environment/Eco-label/Eco-labelled_products/product_categories_en.htm A copy of the flow chart is in the Module A Resource Materials (Resource 3) and is included as a hard copy in the Handbook.

The criteria for each product group are adopted by the European Commission as legal act.

The assessment and verification requirements to comply with the criteria and the validity of the criteria are part of the decision.

The revision of the criteria starts before the end of the validity period in due time. The revision process is similar structured to that outlined before.

Awarding the Eco-label (Article 7)

The procedures towards the award of the EU eco-label to specific products or services are as important as the procedures outlined under article 6. Therefore, the regulation is very specific on this issue. Due to the fact, that the procedures for the award of the eco-label will be outlined in more detail under module B, this section will give a short introduction to the procedures.

Steps to Award the Eco-label

The regulation outlines the following basic steps to award the EU eco-label:

Step 1: Application for the EU eco-label for a specific product submitted by manufacturers, importers, service providers, traders and retailers to a competent body.

Step 2: Based on the application and the provided information by the applicant, the competent body verifies that the product complies with the official criteria and that the application conforms to the assessment and verification requirements.

Step 3: After final verification of the application the competent body shall conclude a contract with the applicant (in accordance with article 9).

Step 4: The competent body notifies the European Commission on the contract (the information delivered by the competent bodies is baseline for the Commission's register on the eco-label user).

Notes on Award Procedures

Please find detail information on the award procedure under module B. Information on the award procedures and related aspects (like fees) are available under the Commission's website:

http://ec.europa.eu/environment/Eco-label/Eco-labelled_products/application_procedure_en.htm

The Eco-label (Article 8)

Part of the regulation is the official logo of the EU eco-label which is further explained under Annex III of the regulation.

The official logo of the EU eco-label consists of two part:

- pictogram (the “flower”)
- specifications for the environmental information relevant to each product group.

The specifications for the environmental information are part of the official adopted criteria for each product group.

Explanatory note: The use of the EU eco-label is specified under article 9.

Terms of Use of the EU Eco-label

(Article. 9)

The regulation outlines specific requirements and terms of use of the EU eco-label. Detail information will be given under module B.

The regulations stressed the following basic aspects for the use of the EU eco-label:

- the use of the EU eco-label by a user (like a company) is based on a valid contract which outlines the terms of use in detail (see co-decision on the standard contract), including provisions for withdrawing the authorisation to the use of the EU eco-label
- reconsideration of the authorisation of the use of the EU eco-label related to revised or terminated criteria for the specific product group
- miss-use of the EU eco-label (false or misleading advertisement).

A copy of the Commission’s decision on a Standard Contract for the terms of use of the Eco-label is in the Module A Resource Materials (Resource 4) and is available as an electronic document.

Promotion of the Eco-label (Article 10)

Under article 10 the regulation outlines some basic requirements related to the promotion of the EU eco-label. The regulation stressed the obligation for the Member States and the European Commission, in cooperation with the members of the EUEB, to promote the use of the EU eco-label by awareness-raising actions and information campaigns for consumers, producers, traders, retailers and the general public, thus supporting the development of the scheme.

The special role of the EU eco-label within green public procurement is highlighted, that in order to encourage the use of the eco-labelled products the Commission and other institutions of the Community, as well as other public authorities at national level should set an example when specifying their requirements for products (within the tendering process).

Explanatory note: Please use for further information on the marketing strategy and related objectives and actions the working plan. The development of marketing approaches to promote the use of eco-labels is part of module C. The promotion of eco-labels through green public procurement is outlined in more detail under module D.

Other Eco-label Schemes in the Member States

(Article. 11)

Within this article the regulation stressed the need to develop cooperation and coordination measures between the EU eco-label and national eco-label schemes by safeguarding the co-existence of the various eco-label schemes.

The regulation highlighted the following aspects on cooperation and coordination between the various eco-label schemes:

- product group development
- criteria development and revision
- use of the EU eco-label and a national eco-label on the same product.

Explanatory note: The general question of cooperation and coordination between different eco-labelling schemes are part of 2.6. At this point it has to be stated, that the issue of cooperation and coordination was part of a long-lasting political debate of the co-existence of the EU eco-label scheme and the national eco-label schemes. The work on cooperation and coordination within the management group set out in the framework of the further development of the overall strategy for the EU eco-label (working plan) did not resulted in any official agreements or measurements. The work so far was mostly based on the exchange of information between the various schemes (including the presentation of good examples in this field). In the light of the upcoming revised regulation the aspect of better cooperation and coordination is reduced to some specific applications (like EU eco-label criteria as minimum requirements for the setup of national eco-label criteria).

Costs and fees (Article 12)

Under article 12 the regulation stressed the need, that every application for the award of an EU eco-label shall be subject to payment of a fee by the applicant:

- relating to the costs of processing the application (so called application fee) and
- relating to the use of the EU eco-label (so called annual fee).

Annex V of the regulation and the Commission's decisions on the application and annual fees outline the following structure of the fee system within the EU eco-label:

Application Fees

An application for the award of an EU eco-label will be subject to payment of a fee to the competent body relating to the costs of processing the application. A minimum and a maximum fee are fixed between 300 and 1.300 EUR. Reductions: In the case of SMEs and also product manufacturers as well as service providers of developing countries the application fee shall be reduced by at least 25 % (cumulative up to 50%) and shall apply for the minimum and the maximum fee.

Annual Fees

Each applicant who has been awarded an EU eco-label will pay an annual fee for the use of the EU eco-label to the competent body which has awarded the label. The period covered by the fee will begin with the date of the award of the eco-label to the applicant.

The annual fee is calculated by a factor of 0.15% in relation to the annual volume of sales (in ex-factory prices) within the Community of the product awarded the eco-label. A minimum and a maximum fee are fixed between 500 and 25.000 EUR. Reductions:

In the case of SMEs and also product manufacturers as well as service providers of developing countries, the annual fees will be reduced by at least 25 %. Applicants who have already received certification under EMAS or ISO 14001 may be granted additional reductions in the annual fee by 15%. Competent Bodies may grant reductions of up to 25 % for up to the first three applicants in each Member State that are awarded the Eco-label for a given product group. Competent bodies may grant a reduction of up to 30 % where the product in question has also been awarded another eco-label that complies with the general requirements of ISO 14024. All of the above reductions shall be cumulative and shall also apply to the minimum and maximum annual fee, but shall not exceed in total 50 %.

Costs for Testing and Verification

Neither the application fee nor the annual fee include any cost towards testing and verification which may be necessary for products which are the subject of applications. Applicants will meet the cost of such testing and verification themselves.

Notes on Fees

For further details on the fee structure of the EU eco-label please study the Commission's decision on the application and annual fees carefully. Copies of Commission Decisions on Fees are in the Module A Resource Materials (Resources 5 and 6) and are available as electronic documents. It has to be stated, that the fee structure outlined in the decisions are only a framework for the competent bodies. The current fee levels may vary between the Member States. Furthermore, in the case of tourist accommodations and campsites the fee structure was modified in relation to the market structure (e.g. micro-enterprises) and was part of the decision on the criteria.

European Union Eco-Labelling Board (EUEB)

(Article 13)

The European Union Eco-Labelling Board (EUEB) is the central institutional (consultative) body of the EU eco-label scheme. Related to the regulation and the Commission's decision of 11 November 2000 establishing the EUEB and its rules of procedure the EUEB consists of the following members:

- Competent bodies of the EU Member States and the EEA countries
- Members of the Consultation Forum (stakeholder groups).

A copy of the Commission's decision on the EUEB is in the Module A Resource Materials (Resource 7) and is available as an electronic document.

Additionally, representatives of the Member States (primarily representatives from responsible ministries), members of the Commission and others (on request by the chair) may participate in the EUEB meetings.

The EUEB is chaired by a competent body or representative of an EU Member States during their time of the EU presidency (6 month). The European Commission functions as secretariat to the EUEB.

Roles of the EUEB

The main roles of the EUEB are:

- request the Commission to initiate the procedure for setting the ecological criteria as well as the related assessment and compliance verification requirements for product groups
- contribute to the setting and review of eco-label criteria as well as the related assessment and compliance verification requirements for product groups
- be consulted by the Commission on the EU eco-label working plan,
- cooperate with the Member States and the Commission in promoting the use of the EU eco-label.

Tasks and Activities of the EUEB

As outlined in the Commission's decision on the establishment of the EUEB the tasks and procedures of the EUEB cover a wide range of activities which could be clustered towards the following fields:

- preparatory work in relation to initiate the procedure for setting ecological criteria for product groups
- mandate to develop or revise criteria
- mandate to review criteria
- input regarding the working plan
- other actions by the members of the EUEB (marketing, harmonised application of the eco-label, internal guidelines on procedures etc.)
- review of the setup and procedures of the EUEB.

Explanatory note: Please refer for detail information on the roles and procedures of the EUEB to the Commission's decision on the establishment of the EUEB and its rules of procedure.

Competent Bodies (Article 14)

Beside the European Commission, the competent bodies form the baseline of the proper implementation of the EU eco-label scheme. The regulation stressed, that each Member State shall appoint a competent body or competent bodies and ensures the proper operational functionality of the competent body/competent bodies to carry our the tasks provided for in the regulation.

Obligations for Appointment of Competent Bodies

The regulation provides some obligations for the Member States in relation to the appointment of the competent bodies:

guarantee their independence and neutrality

- ensure active involvement of all interested parties on the national level
- ensure an appropriate level of transparency
- ensure the correctly application of the provisions of the regulation.

Explanatory note: All competent bodies and their detailed contacts are provided under the eco-label website: http://ec.europa.eu/environment/Eco-label/contacts/competent_bodies_en.htm

Note on Legal Status of Competent Bodies

The legal status of the competent bodies is not defined by the regulation. Therefore, the competent bodies have different legal status, ranging from ministries and other public authorities to private organizations. Some Member States nominates more then one competent body due to political (Spain) or legal aspects (Germany). Beside the diversity in the legal and the organizational status, there is also a variety on the financial status of the competent bodies: some competent bodies get fully or partly public funded, other rely only on the fees coming from the awarded licences.

Consultation Forum (Article 15)

To ensure the proper and balanced participation of interest groups, the regulation provides the establishment of a Consultation Forum. As stated under article 13 (EUEB) the Consultation Forum is integrated part of the EUEB.

The regulation and Commission's decisions on the establishment of the EUEB and the establishment of the Consultation Forum explicitly named various interest groups, like:

- industry (UNICE)
- service providers
- small and medium-size enterprises (SMEs), crafts and their business organizations (UAPME)
- trade unions (ETUC)
- traders
- retailers (Eurocommerce)
- importers
- environmental protection groups (EEB) and
- consumer organizations (BEUC).

A copy of the Commission's decision on the Consultation Forum is in the Module A Resource Materials (Resource 8) and is available as an electronic document.

In principle, the EU eco-label is open to any interest group which might be interested or affected by the eco-labelling work.

Role of the Consultation Forum

Based on the Commission's decision of 10 November 2000 on the rules of procedure of the Consultation Forum the role of the Consultation Forum is outlined as follow (in accordance with the roles of the EUEB):

- requesting the Commission to initiate the procedure for setting the ecological criteria as well as the related assessment and compliance verification requirements for product groups
- setting and reviewing eco-Label criteria as well as the related assessment and compliance verification requirements for product groups
- being consulted by the Commission on the Community Eco-Label working plan
- promotion and use of the Community Eco-Label.

Notes on Consultation Forum

The setup of the Consultation Forum might seem little bit confusing. This has some historical reason which was explained in the legal and institutional setup of the EU eco-label scheme before. Due to the fact, that the members of the Consultation Forum has become also full membership in the EUEB under the current regulation, the need to keep the Consultation Forum as own institutional entity was based on the position to sustain the political and financial support of the interest groups by the Commission and the Member States and to keep the principle of participation on a high level. Due to the legal setting of the co-decision procedure within the European Union, interest groups are not part of the decision-making process itself, either on the political or on the technical level of eco-labelling. This caused several problems in the past to fully mobilise support and acceptance for the EU eco-label scheme by the various interest groups (within most national eco-labelling scheme interest groups are fully part of the decision-making process).

The strategic role of stakeholder groups and civil society organizations within the promotion of SCP and eco-labelling will be further outlined under module D.

Adaptation to Technical Progress (Article 16)

The regulation provides possibilities to adapt the annexes (e.g. procedures, methodologies) of the regulation to technical progress including progress in the relevant international standardisation activities.

Committee Procedure (Regulatory Committee) (Article 17)

Related to the Treaty of the European Union, the regulation provides the need to setup a committee (Regulatory Committee) to assist the Commission in the decision-making process. Therefore, the regulatory committee is the central decision-making body of the EU eco-label scheme.

The regulatory committee consists of the representatives of the EU Member States and is chaired by the Commission. The regulatory committee is setup as "technical committee" and the laid down procedures (e.g. voting) follow the same procedures (so called comitology) as of the co-decision process between the Commission, the Council, and to some extent also the Parliament.

Basis of Committee Decisions

This means, that a decision is based on the (single or qualified) majority of votes related to the total number of votes and not of a majority of Member States (each Member States has a special amount of votes related to their inhabitants). The regulatory committee gives its opinion on the Commission's proposals where ever it is outlined in the regulation, like:

- new and revised criteria
- rules of procedures for the EUEB and the Consultation Forum
- working plan
- fees

- standard contract.

Explanatory note: The regulation of the EU eco-label and the procedures for the regulatory committee is not subject of the decision-making of the regulatory committee. These are decided on the political level (Commission, Council, and Parliament).

Infringements (Article 18)

In case of non-compliance with the provision of the regulation Member States shall take appropriate legal or administrative measures.

Explanatory note: This is not practically applied so far.

Transitional Provisions (Article 19)

Revision (Article 20)

Final Provisions (Article 21)

The regulation provides under articles 19, 20 and 21 some requirements in relation to:

- transitional aspects (validity of contracts under the old regulation)
- the review of the EU eco-label scheme
- date of enforcement.

Explanatory note: The transitional aspects will become some importance in the near future when the revised regulation will enter into force by end of 2009 or so. This means, that all contracts which are based on regulation 1980/2000 remain in force until they are revised or have expired.

Annexes of 1980/2000

Annex I – V of the regulation are already explained under the above mentioned articles.

Final Explanatory Note

Due to the dynamic character of the EU eco-label please use the Commission's eco-label website as reference for updates:

2.5.3 Status of Implementation

Introduction

In this Section

This section gives an overview of the status of implementation of the EU eco-label based on available statistical material provided by the Commission.

The section provides information on the following facts:

- product groups under the EU eco-label scheme
- evolution of the number of licences since 1992

- number of licences by producer country
- distribution of award by product group
- recognition by consumers

Explanatory note: Most of the statistical material is available under: http://ec.europa.eu/environment/Eco-label/about_Eco-label/facts_and_figures_en.htmhttp://ec.europa.eu/environment/Eco-label/about_Eco-label/facts_and_figures_en.htm

Product Groups

Total Number

The following product groups and services (in total 22) are established within the EU eco-label scheme.

All information on the product groups (like criteria documents, minutes of the meetings etc.) are found under: http://ec.europa.eu/environment/Eco-label/Eco-labelled_products/product_categories_en.htm

Cleaning

- All purpose cleaners and cleaners for sanitary facilities
- Detergents for dishwashing machines
- Hand dishwashing detergents
- Laundry detergents
- Soaps, shampoos and hair conditioners

Clothing

- Clothing, bed linen and indoor textiles
- Footwear

Do-it-yourself

- Hard floor coverings
- Paints and varnishes

Electronic Equipment

- Personal computers
- Portable computers
- Televisions

Gardening

- Growing media and Soil improvers

Household Appliances

- Light bulbs
- Heat pumps

Lubricants

- Lubricants

Other Household Items

- Mattresses

Paper

- Copying and graphic paper
- Tissue paper

Services

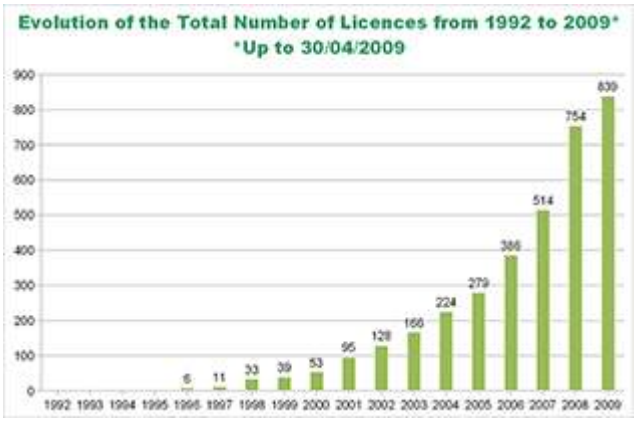
- Campsite services
- Tourist accommodation service

Product Groups Under Development

- Buildings
- Wooden furniture
- Printed Paper
- Revision of product groups in the framework of the EuP working plan (refrigerators, washing machines, computers and laptops, lightning)

Evolution of the Number of Licences since 1992

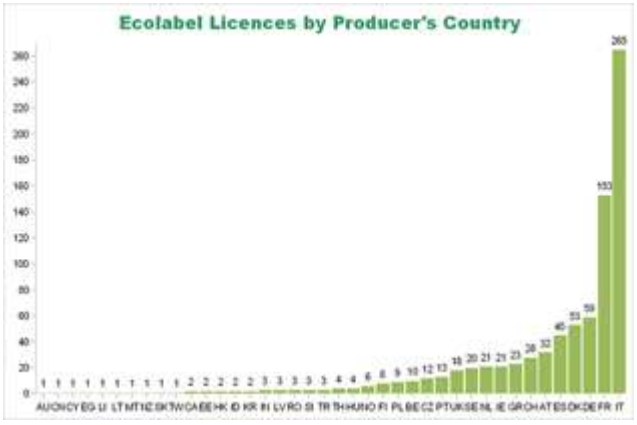
Since the EU eco-label was established in 1992, the number of companies receiving the label has increased year after year. By end of April 2009, more than 830 companies were awarded the EU eco-label for their products. About 230 new companies were added to the Green Store Catalogue in 2008: 45% more than in 2007.



Explanatory note: All information on the users of the EU eco-label will be available under: http://www.eco-label.com

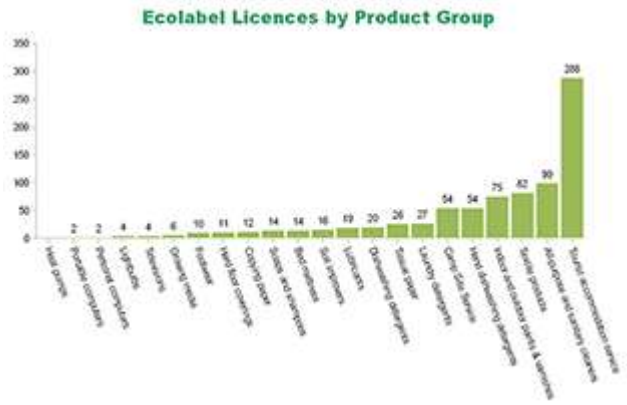
Number of Licenses by Producer Country

By July 2009, Italy and France have the greatest number of eco-label holders, with more than 260 and 150 licences respectively. They are followed by Denmark and Germany who each have more than 50 licences.



Distribution of Award by Product Group

The EU eco-label is currently awarded to 22 categories of products and services. Tourist accommodation services represent 34% of the total number of licences. This is followed by all-purpose and sanitary cleaners (12%), with textile products and indoor and outdoor paints and varnishes each representing 10% of licences.



Consumer's Recognition of the EU Eco-label

Survey Results

Based on a recent EU-wide survey amongst European's consumers on their attitudes on sustainable consumption and production the following main findings could be stated related to the recognition of the EU eco-label and related aspects:

- A slim majority (55%) of EU citizens claimed that when buying or using products they are – generally – fully aware or know about the most significant impacts of these products on the environment. In Cyprus, Lithuania and Bulgaria, however, around 6 in 10 respondents said they know little or nothing about such impacts.
- Slightly more than 8 in 10 EU citizens felt that a product's impact on the environment is an important element when deciding which products to buy (34% "very important" and 49% "rather important"); only 4% said this is not important at all.
- Although a large majority of respondents in all EU Member States and Croatia said that a product's impact on the environment is important in their purchasing decisions; in only three Member States did more than half say that this aspect is very important: Greece (58%), Cyprus (57%) and Italy (54%).
- Almost 6 in 10 interviewees rated environmental impact as more important than a product's brand name in terms of influencing their product purchasing decisions. Nevertheless, only a minority rated environmental impact as more important than a product's quality or price (7% and 19%, respectively).
- A large majority of respondents in all countries in this study said they often, or always, take energy-efficiency into consideration when buying products that use electricity or fuel – ranging from 59% in Cyprus to 85% in Germany.
- Almost half of EU citizens said that Eco-labelling plays an important role in their purchasing decisions; the proportion saying this is important ranged from 22% in the Czech Republic to 64% in Greece.
- EU citizens were the most likely to say that the most important information on environmental labels is whether possible to recycle or reuse a product. Information about the total amount of greenhouse gas emissions released by a product – i.e. the carbon footprint – was considered to be the least important (selected by 10%, compared to 38% for "recycle and reuse").
- Support for introducing a mandatory label indicating a product's carbon footprint ranged from 47% in the Czech Republic – the only country where less than half of respondents were in favour of such labelling – to 9 in 10 respondents in Croatia and Greece.
- Almost 4 in 10 EU citizens in the survey had seen the EU Eco-label, or had heard about it; nevertheless, only roughly a fifth (19%) said they have also bought products bearing the label.

- Awareness of the EU Eco-label was the highest in Lithuania, Denmark and Estonia (between 49% and 51%) and the lowest in the UK, Italy and Sweden (between 26% and 31%).

Explanatory note: Please find detail information on the survey under:

http://ec.europa.eu/public_opinion/flash/fl_256_en.pdf

2.5.4 Outlook towards the new regulation

Introduction

While the EU eco-label scheme has been growing well over recent years, it is clear that more can be done to increase the effectiveness of the scheme (e.g. streamline its procedures). Therefore, as required by the regulation 1980/2000, the Commission started the review process on the implementation of the EU eco-label scheme in 2004. The results of the review process formed the baseline to setup the needed consultation process with Member States, stakeholder groups, members of the EUEB, and within the Commission to draw up a new regulation for the EU eco-label.

After the official consultation phase and an impact assessment in 2007 the Commission proposed a new regulation on the EU eco-label within the framework of the EU Action Plan on Sustainable Consumption and Production and Sustainable Industrial Policy (SCP/SIP). Within the second half of 2008 and first half of 2009 the proposal was intensively negotiated between the Commission, the Member States and the European Parliament to its final stage in April 2009, where the European Parliament voted in favour on the proposal.

Due to the co-decision procedures and other legal requirements, the proposal of the new regulation is expected to be adopted in autumn 2009 after the establishment of the new Commission. It is expected that the new regulation will come into force by end of 2009 or the beginning of 2010.

Evaluation of the EU Eco-label

Based on an extensive evaluation study in 2004/2005 (so called EVER study) the main findings on the status of the EU eco-label could be summarised in the following way:

micro-level

- scheme successful - helps to improve the environmental performance of participating organizations, also influencing suppliers
- useful benchmark of environmental performance - evaluation confirms that the EU Eco-label criteria are used even by non-participating companies.

macro-level

- penetration represents a very small fraction of the potential EU market.

Key Barriers:

- Low awareness and uneven geographic coverage
- Insufficient product group categories
- Procedural and organizational problems – i.e. bureaucracy
- Fees and cost of getting the label
- Lack of perceived public purchasing benefits.

Explanatory note: The results of the Ever study are presented under:

http://ec.europa.eu/environment/Eco-label/about_Eco-label/revision_of_Eco-label_en.htm

Challenges

Out of these findings the Commission concludes the following challenges and proposals for the new EU eco-label regulation:

Lack of Flexibility	a) Regulation is too restrictive, lacks flexibility, unable to respond to new environmental challenges. New Regulation: • rewritten in an less restrictive way • simplified procedures • fits better with other sustainable production and consumption actions – e.g. ensure public procurement recommendations are made in eco-label criteria • allow Commission to develop eco-label criteria themselves – better coordination.
Co-operation and Harmonisation	b) Insufficient co-operation and harmonisation with other eco-label schemes at national and regional level New Regulation: • option for rapid adoption of other nation labels' criteria • if a national scheme wishes to develop a new product group that is already covered by the eco-label, they must take on the eco-label criteria.
Stakeholder Involvement	c) Insufficient stakeholder involvement in product group criteria development New Regulation: • ensure criteria development process includes full consideration of all stakeholder inputs • allow option for stakeholders to lead criteria development process.
Bureaucracy and Low Number of Product Categories	d) Procedural and organizational problems – i.e. excessive bureaucracy e) Low number of product group categories. New Regulation: • streamlined criteria development process, with more flexible management • option for rapid adoption of other nation labels criteria • option for Commission to develop criteria • focus only on main environmental impacts of products.
Fees and Costs	f) Fees and cost of getting the label New Regulation: • lower annual fees (Maximum €1500 instead of €25000) • consider costs of tests systematically in criteria development process.
Funding for Marketing	g) Lack of funding for marketing New Regulation: • Not possible to deal with directly in Regulation, although improvement and streamlining of the scheme will help, as will better linking with other policies. (i.e. using Ecodesign work) • Commission planning to dedicate more resources to marketing and criteria development.
Consistency	h) Lack of consistency with regards to implementation of the regulation in MS

New Regulation:

- Give Competent Body forum official status.

Explanatory note: A short outline of the objectives and challenges of the revision is available under:

http://ec.europa.eu/environment/Eco-label/about_Eco-label/revision_of_Eco-label_en.htm

Expected Targets and Outcomes

Planned outcomes:

- 40/50 product groups by 2015
- many more eco-label products on the shelves for consumers to choose from
- criteria documents which can easily be used by public purchasers
- an eco-label very well harmonised with other labels, globally and nationally
- an Eco-label that can be attained by companies with limited costs and efforts for them while still maintaining a high ambition

To be evaluated by the end of 2011: widening-up the scope of the EU eco-label to food and drinks.

The draft revised regulation is available under:

http://ec.europa.eu/environment/Eco-label/about_Eco-label/revision_of_Eco-label_en.htm

2.6 Mutual Recognition and Collaboration

2.6.1 Eco-labelling and Trade

Introduction

Note: The June 2003 GEN paper: "*Trade as an Environmental Policy Tool? environment as a Trade Policy Tool?*" was used as a reference document for this section. A copy of this is included in the Resource Materials as an electronic document (Resource 9).

A broad debate over environmental labelling and trade, has been ongoing for many years, with particular emphasis on non-product-related (npr) process and production methods (PPMs). It is still not clear whether the issues being raised apply equally to the broad range of environmental labels in existence. These include, but are in no way limited to, a range of organic labels, labels identifying Genetically Modified Organisms or Genetically Engineered Foods, environmental performance rating labels, resource management labels, labels of verified environmental claims, and of course the Type I, II and III labels identified by the ISO. The challenge is to understand the trade issues and concerns being debated.

World Summit on Sustainable Development 2002

At the August 2002 Johannesburg World Summit on Sustainable Development (WSSD), a more positive policy environment for environmental labelling evolved. A number of implementation plans were discussed, including one on changing unsustainable patterns of consumption and production, within which, "…effective, transparent, verifiable, non-misleading and non-discriminatory consumer information tools…" such as environmental performance leadership labels ("eco-labels"), were promoted.

World Trade Organization (WTO)

Several World Trade Organization (WTO) Agreements contain rules potentially applicable to Eco-labels, including, of particular interest to Eco-labels, the General Agreement on Tariffs and Trade 1994 (GATT 1994 *or* GATT), and the Agreement

on Technical Barriers to Trade (TBT). Each agreement contains its own set of rules, but a good deal of uncertainty exists about how these agreements apply to eco-labels.

General Agreement on Tariffs and Trade (GATT)

The GATT 1994 contains the basic disciplines for regulating trade between WTO Members. In particular, the GATT requires that member states should treat products imported from other member states no less favorably than "like" domestic products. While the GATT rules out treatment that discriminates either between "like products" from different WTO trading partners, or between foreign and domestic "like products", the situation is less clear when eco-labels differentiate between products on the basis of process or production methods (PPMs). Some PPMs will affect the characteristics of the finished product, in which case the analysis should be similarly straightforward. Frequently, however, PPMs do not affect final product characteristics. These so-called "non-product-related" (npr) PPM requirements are typically based upon life-cycle considerations, and may differentiate between products based partly upon environmental impacts associated with processes or production methods.

Technical Barriers to Trade Agreement (TBT)

The Agreement on Technical Barriers to Trade (TBT) covers both technical regulations, with which compliance is mandatory, and standards, with which compliance is voluntary. Generally, in the context of the TBT, voluntary labels are considered standards.

TBT Code of Good Practice

The principal rules for standards, including privately administered labels, are outlined in the TBT Agreement's Code of Good Practice. The Code contains:

- Most Favoured Nation (MFN) and national treatment obligations;
- a requirement that standards not create unnecessary obstacles to trade;
- a requirement that standards should be based on international standards except when such standards would be inappropriate or ineffective;
- harmonization of international standards should be sought to the degree possible and within the limits of available resources; and
- provisions for notice and transparency. (For example, standardizing bodies must publish work programs every six months and provide opportunities for interested parties to submit comments during standards development.)

Applicability of the TBT

An important distinction concerning TBT Agreement applicability is whether the operating entity is a central government body or another type of standardizing body. The TBT Agreement can only be binding on WTO Members and therefore cannot directly reach private organizations. However, Members must "take such reasonable measures as may be available to them" to ensure that all bodies within their territories comply with the relevant provisions.

Trade Concerns

What are the Trade Concerns?

From a review of the WTO related agreements and related activities over the last few years, it appears that there are three major concerns related to Eco-labels:

(i) that certification criteria which contain requirements related to the non-product aspects of production (ie npr PPMs) may create an unnecessary barrier to trade;
(ii) that Eco-labelling programs limit access to the label; and
(iii) that Eco-labelling programs not follow the TBT Code of Good Conduct.

Whether or not voluntary Eco-labelling programs need to properly address these concerns is, of course, also an issue of debate.

Type I Labels and PPMs

Are the Concerns Real (i.e. do they apply to Type 1 programs)?

- In regard to the npr PPM concern, GEN type Eco-labelling programs focus on environmental criteria which occur across the entire life cycle of products and not just exclusively on npr PPM requirements. The Global Eco-labelling Network conducted a limited analysis of some 140 certification criteria and found that 10% contained npr PPMs, and a further 12% had specific requirements for recycled content. (It can be argued that recycled content may or may not be considered an npr PPM related requirement, as the recycled material does get transferred with the product, but may not affect product characteristics or performance.)

Of the 14 (10%) criteria containing npr PPM related requirements:

- 1 was for a product that is not exported nor imported from off-shore (electricity);
- 11 were for pulp and paper products; and
- 2 were for products with organic and/or fair trade requirements with both only being imported from off-shore (coffee and cotton clothing)

Of course, when discussing the application of the PPM requirement in regard to environmental issues, it is difficult to successfully argue that impacts in one country do not affect the environment of another country.

Type I Labels and Access to Markets

In regard to the concern about limiting access to Eco-labels and the concern about the application of the TBT Code of Good Conduct, the GEN has adopted the ISO 14024 principles (which considered the TBT code during its development) as a code of good conduct. Based on a recent membership survey, all members surveyed indicated that they do not limit access to their label on any basis whatsoever. There is no "favoured nation" treatment, and the principles outlined in ISO 14024 are being met. Furthermore, a number of studies into Eco-labelling and trade concerns have been conducted over the past several years. Of note, and in spite of the theoretical potential for these concerns to be realized, none have identified specific problem areas or programs where Type I Eco-labels have caused specific trade problems.

2.6.2 Existing Collaboration

The Global Eco-labelling Network (GEN)

In 1994, the Global Eco-labelling Network (GEN)

(ref: www.globalEco-labelling.net) was launched to provide a forum for information exchange and cooperation. Eco-labelling, in the GEN context, is limited to programs or schemes that are life cycle based, voluntary, third party, multi-sector and selective (defining environmental leadership) - in other words, that fit the ISO Type I definition. Some twenty-six programs from all corners of the world are members of the GEN and new programs are being developed each year.

For a number of reasons, the GEN is evolving into much more than a forum for information exchange and is now involved in technical assistance and inter-program cooperation. This evolution has been driven by a number of factors:

- business and commerce are increasingly globalized, both from a manufacturing and a trade perspective;
- the environment issue is finding its way onto the agendas of the business and manufacturing communities, and governments at all levels;
- Eco-labelling programs are spreading into, and expanding in all regions of the world;
- the potential for Eco-labelling to cause unnecessary barriers to trade is being discussed and analyzed in a number of intergovernmental bodies;

and

- the ISO has developed standards for environmental labelling.

GENICES

In response to these drivers, and in order to develop a systematic approach to mutual recognition, the GEN has developed the **GEN I**nternationally **C**o-ordinated **Eco-label**ling **S**ystems (GENICES). GENICES has a four step process:

(a) information exchange;
(b) development of mutual confidence;
(c) agreement on mutual recognition of testing and auditing;
(d) mutual recognition of certification on a product specific basis, with examination of the degree of harmonization or equivalency of criteria.

The system is designed to facilitate (in terms of costs and time) the certification of products from different parts of the world, as well as between Eco-labelling practitioners.

The process was initially tested on a bilateral pilot basis. The full process has now been developed and some five members have successfully been peer reviewed.

GENICES Benefits

Benefits

- allow new programs to get quickly started with criteria already created in many product categories and with potential income from products that are internationally traded and certified elsewhere;
- be of interest to large multinationals in terms of facilitating, simplifying and making more cost-effective the whole Eco-labelling process,
- enable companies with environmentally preferable products and services to enter export markets more easily and quickly,
- "share" the costs of criteria development and review where harmonization or development of common criteria is set as a common objective and task,
- raise the significance and value of the GEN, and
- deal effectively with any concerns about trade barriers.

GENICES Guiding Principles

1. The GENICES is to provide a mechanism for enhanced multilateral cooperation and collaboration. It is a process to enable GEN member organizations' customers to have access to other GEN member organizations' programs.
2. GENICES participation is to be voluntary and open only to GEN members.
3. A formal methodology will be used to achieve multilateral mutual trust (MMT).
4. The GENICES is to remain for an indefinite period of time, but continue to evolve.

GENICES Application and Peer Review Process

1. Application Stage: Voluntary preparation and submission of applications by GEN member organizations for "Panel/Peer Review".
2. Panel Review #1: Review of the applications at a Panel/Peer Review meeting in order to identify additional information requirements.
3. Site Visits / Spot Checks on items identified in the application documentation and to acquire better understanding of specific processes, procedures and practices.
4. Panel Review #2: A second review of the application, and a review of the site visit report and any supplemental information, to determine compliance with the GENICES requirements.
5. Awarding of “Merit Certificate” and Announcement of Successful Applicants

GENICES Application Content

The application will typically contain information on processes to:

- Select Product Categories
- Develop Criteria
- Ensure confidentiality
- Determining and Ensuring compliance
- Ensure transparency
- Remain impartial
- Ensure access
- Avoid conflict of interest

The submission (application) should also contain information on:

- Cost and Fees
- Mutual Recognition
- International Trade Aspects
- Reporting/Publication
- Staff and Auditors' Qualifications
- Quality Management System

2.7 Designing and Launching New Eco-labels

2.7.1 Overview

Introduction

Eco-labelling is both a market-based policy tool and a marketing and sales tool. Like the design of marketing strategies, one of the fundamental considerations is the target audience for the program. If the audience is primarily in a different part of the world, then one needs to consider whether a national program will be well received and recognized in the target market or whether you should aim to have exported products Eco-labelled by a more local program.

If it is decided that a new eco-labelling program be established in your region or country, considerable efficiencies can be gained by learning from established programs. However, because each country has its own unique culture and ecosystems, it may not be appropriate to simply copy a program for your own application. Nonetheless, there are many elements and structures that will be transferable. The following paragraphs provide a framework for consideration in developing a Type I eco-labelling program.

Five Steps

The five major steps for consideration are:

(1) Take Stock
(2) Lay the foundation
(3) Design the program
(4) Develop the business plan
(5) Implement the program

2.7.2 Taking Stock

Introduction

Consideration should be given to the current economic, environmental and public policy conditions and to the fundamental objectives of creating an Eco-labelling program. As well, one should examine whether the basic building blocks are in place and whether more effective and credible alternatives are available.

Identifying

In taking stock of current circumstances and environmental objectives,

Objectives

consideration needs to be given to the best way to meet these objectives. In some countries, for example, Eco-labelling can form part of a trade promotion strategy. However, having a local or regional program may not be the best option if some national or local application is not of value. In this case, encouraging exporters to meet the Eco-labelling criteria in their key markets may be more beneficial. The current UNEP-EU project may be a good example where Type I European Eco-labels applied to incoming products are to be used to better access European markets. Of course, having a national Eco-label with mutual recognition with a European Eco-label would also work just as well.

Another option is to establish a program that focuses on specific export products and adopts the criteria established in the most important export markets. This option would still involve the establishment of an Eco-labelling program, but would give it limited initial focus.

Another alternative may be to collaborate on the formation of a multinational Eco-labelling program. Two regional (multinational) programs currently in existence are the European Flower and the Nordic Swan.

Of course, other types of labels are also possible candidates, again depending on the objective. If the export products are primarily of agricultural origin (cotton, food products, wood products) then specific types of labels may be more advisable. Examples include organic certifications and sustainable forest management certification. If the products are manufactured goods, with a more commercial or industrial client base, then environmental information labels (such as the ISO Type III label) may be appropriate.

Building Blocks

Building Blocks

(a) **Financial:** most existing programs receive sponsorship funding from governments or foundations. The time and costs involved in establishing such a program are significant. In most cases, a source of support financing should be expected for at least five years. Most programs are designed to eventually be self-sufficient, which means that the revenues from licensees must cover the costs of administration, verification, criteria development, marketing and infrastructure. This will take time. Many national and regional programs, even after years of operation, continue to receive core funding support from national or regional governmental bodies..

(b) **Expertise**: Scientific and technical expertise is also a basic need of Eco-labelling programs. Decisions of product categories and criteria must be based on sound technical knowledge as well as knowledge of market conditions and industry interest. In addition, access to laboratory facilities with the ability to evaluate and test a wide variety of product types may be needed.

(c) **Time:** It will take time to set up all of the program parameters that will meet the unique requirements of a particular country and its economic, social and environmental setting. A program designed for application elsewhere will need to be adapted to local needs.

2.7.3 Laying the Foundation

Introduction

When it has been determined that creating an eco-labelling program is both desirable and doable, the next stage is to lay the foundation.

Collect and Analyze Data

As a first step, the important economic and environmental data should be reviewed in relation to national strategies and priorities in order to determine the environmental and economic objectives of the proposed Eco-labelling program.

Economic Data

The economic data should include information on the major sectors of the

economy that may be interested in Eco-labelling. This will help identify those sectors and sub-sectors in which there are potential opportunities for Eco-labelling. Sectoral data will help target industries that will have the ability to meet Eco-labelling requirements. The data will also provide information on profitability, growth potential, and competitiveness. The analysis will also identify export and import levels and the nature of the domestic market. The domestic data will be important to help determine whether the demographic data (size of population, age distribution, projected growth, education levels, income data, spending patterns, etc) could support development of an Eco-labelling program for domestic purposes.

Environmental Data

The environmental data relates to the state of the nation's environment, and public attitudes towards the environment. In particular, major areas of environmental concerns will be identified together with the location, scope and causes. Environmental infrastructure is also an important consideration as most successful Eco-labelling programs were initially launched with considerable support from national or regional environment departments or agencies, particularly during the initial stages.

The capacity for independent and competent environmental testing and monitoring is also an important requirement for creating and maintaining the credibility of eco-labelling.

Public Policy Context

A final element of the environmental scan is the public policy context and the degree to which a program can focus on those product and service categories and key environmental issues that are articulated in the national economic and environmental policies. In Canada, for example, there is interest in using the Canadian EcoLogo as a market-based policy tool with an initial emphasis on reducing the risk from chemical usage.

Summary for Collecting and Analyzing Data

In summary, the following elements warrant examination:

- Key economic sectors – GDP by sector, size, growth, market share and characteristic of these sectors (number of firms, employees, income, ownership)
- Export-import levels – principal products, key exports by trading partner, key imports by trading partner
- Nature of the domestic market – demographics., income levels, spending patterns, import penetration
- Environmental status – areas of concern, areas where changes in production or consumption could help
- Public attitude – level of environmental awareness, business and consumer priorities, key export markets and consumer preferences
- Environmental infrastructure – government structure, testing facilities and technical capacity, regulatory environment for target product categories, availability of regulations and Eco-labelling requirements in export markets
- Industry survey – determine sectors of interest, impact on competitiveness and acceptance of fees for Eco-labelling
- Consumer survey – level of interest in Eco-labelled products, level of environmental concerns, buying habits
- Public policy context – economic and environmental objectives.

Develop Options

After the data is collected and analyzed, options and recommendations can be formulated. This should address the rationale for creating an Eco-labeling program (domestic purpose, export purpose, etc) and describe how such a

program relates to national objectives. It should also address possible options (this could include using existing foreign labels if the target export target region has a recognized Eco-label in existence). Some consultation with stakeholders will also be critical in getting support from the different factions that play a role in operating a successful program.

Program Rationale

The program rationale should provide the overall principals and guidelines to be used in designing the program, and should include:

- Mission and objectives
- Scope
- Targeted producer – short and long term
- Possible product and service categories
- Key players and roles
- Scope of government involvement
- Funding requirements and options
- Business model for program operation.

GEN Examples

The structure of GEN member programs is highly varied, and ranges from private not-for-profit organizations (NGO), environmental non-government organizations (ENGO), governmental programs, and a variety of blended program designed with government partnering with a range of NGO, ENGO and private sector organizations.

Funding arrangements also vary greatly, from full government subsidy to self-sufficiency to foundation supported.

The main point is that there is no one common structure or approach. Each is designed to meet specific local conditions and circumstances.

2.7.4 Designing the Programme

Introduction

Major areas of focus in the design process are:

- The major activities of the program
- The processes that support these activities

Requirements for the Program

In the design process, it is important to remember that the program must:

(i) reflect the unique setting and needs of your country and / or your export markets
(ii) be credible in terms of transparency, accountability, open access, technical reliability, fairness and independence
(iii) present no unnecessary barriers to trade
(iv) be effective in terms of easily understood procedures, adaptable policies and structure, program assessment, multi-sector participation, reasonable costs and fees, international acceptance
(v) be recognized by consumers, and
(vi) encourage voluntary participation and long-term commitment of industry.

Main Program Activities

The main program activities are:

- product and service category selection
- development of criteria
- certification and licensing, and
- communication and promotion.

Product and Service Category Selection

While product category selection is often directed by government agencies or management boards, or from suggestions from the public or industry, there should be methods for conducting research on:

(a) determining whether there is sufficient interest from the industry sector, or at least some companies within that sector
(b) the degree of environmental differentiation between the products / services in the category
(c) the scope for or potential to improve the environment based in part on improvement potential per product and the volume of products it could affect, and
(d) the degree of environmental interest by the client groups (this includes export markets as well) in the product or service category.

Development of Certification Criteria

Once a category has been selected, the next step is to develop the criteria for determining the eligibility of specific products or services. This is primarily a technical / scientific process and usually involves an assessment of the potential for environmental benefit and the economic feasibility of meeting the criteria. Six key issues form the basis for criteria development:

(i) to what degree should the criteria be based on a life cycle review of the product or service? Most Eco-labelling programs carry out modified life cycle reviews with particular emphasis on those attributes which differentiate products in the same category.
(ii) What degree of stringency should be set for the criteria? Most programs choose criteria that allow 15% to 25% to qualify initially. However, the performance distribution for products is not always uniform and higher or lower cut points may need to be selected.
(iii) Who should be involved in criteria development? A wide variety of options is used by existing programs, varying from internal experts to external consultants. However, the increasing use of other programs existing criteria greatly accelerates and simplifies the process regardless of where the lead is (internal or external).
(iv) Certification criteria must make good environmental and business sense. Expert panels that include technical, business and marketing experts will help ensure that the criteria are established at realistic and achievable levels, thereby helping maintain credibility and fairness.
(v) Public review allows for wider input into the development process and provides further validation of the criteria. Public reviews can take many forms and usually take place over 30 to 60 days.
(vi) While the ISO and GEN have established guiding principles to help in developing programs, there are also a number of international considerations related to WTO agreements and the avoidance of unnecessary barriers to trade.

Certification and Licensing

Once certification criteria have been established, the next step is to ensure that effective and efficient procedures are in place for certifying eligible products or services. Certification activities include application, verification, licensing and monitoring compliance. When these procedures are established, companies may apply for use of the Eco-label.

When interest in having a product Eco-labelled is expressed, appropriate application forms can be provided together with the certification criteria, details on the certification process, and the fee schedule. (reference forward to the forms in Module B)

Audit and verification procedures will need to be developed. These procedures help determine whether the product in question is compliant with the requirements of the certification criteria. (detailed examples in Module B for EU procedures). Auditor qualification should typically be consistent with the ISO lead

auditor qualifications used in ensuring ISO 9000 (quality assurance) compliance.

A licensing contract will also need to be developed, most likely with help from legal advisors. Each country will have its own legal requirements fro structuring such contracts. Upon successful completion of the verification process, a license agreement is prepared which transfers the right to use the Eco-label with the product in question. The licensing agreement usually also addresses such issues as non-compliance, revocation of the license, and considers potential impacts of termination on the business.

Regular monitoring to ensure ongoing compliance is normally carried out on a "spot-check" basis.

An eco-labelling program must be widely known and respected if it is to succeed. Public awareness of domestic focused programs is likely to be very low at the initial stages of the program's life. Therefore a variety of communication activities will be needed to build awareness and encourage participation. It is also in the clients' interests to have a recognized and credible brand. Clients, thus, can become important partners in building brand awareness.

Communications

Industry outreach is required to ensure that new companies apply for use of the Eco-label. One of the most effective methods of encouraging new clients to have products certified is to promote green procurement with governmental agencies, and a variety of institutions and businesses. This approach is often called demand side marketing. On the other hand, supply side marketing is also required, wherein contact is established and maintained with a broad range of potential clients. This is really more like direct selling.

Also, in today's world, a competent and attractive web site is indispensable. It must be comprehensive, yet easy to navigate. Experience shows that these sites are used by potential clients, professional buyers, academics and researchers.

2.7.5 Developing a Business Plan

Introduction

The success of an Eco-labelling program will depend on the acceptance and level of commitment among public and business leaders, government officials, industry and consumers. A business plan will synthesize much of the work done on planning and designing your program. It will provide:

- a clear articulation of objectives,
- an explanation of the process to be used in reaching the objectives,
- an estimate of the time required to establish processes and meet operational goals,
- established benchmarks for measuring short and long term progress.

The business plan will also be necessary to sell the program to government officials, legitimize the program to clients and other observers, and provide the vehicle for securing the necessary funding. The period for the normal business plan is two to five years, though the focus of the first plan must be the start-up activities and initial financing.

Business Plan Content

A typical business plan will include:

(1) Program Context and Approach – rationale, mission, objectives, economic and environmental context, and relevant international issues
(2) Situation Analysis and Market Assessment – state of green markets, government's interest in market-based policy instruments, value of Eco-labels, domestic and international markets, environmental awareness, target sectors
(3) Development Strategy – operating principles, product selection methodology,

start-up approach, medium term objectives, development process for criteria development, development of label and standards for use, outreach to potential licensees, growth projections

(4) Communication Strategy – communication objectives, complementary initiatives with key groups, target groups and goals, nature of communication activity for each group
(5) SWOT Analysis (Strengths, Weakness, Opportunities, Threats) - basically a risk / opportunity assessment, risk and mitigation measures, potential opportunities
(6) Financial Plan – budget with scenarios based on variables such as known and potential funding and anticipated revenues, cash flow projections, monthly or quarterly projections of both revenues, core funding and expenditures
(7) Program Structure – staffing stages, types of personnel required, management structure (including governance and advisory Boards), accountability and reporting framework, roles and responsibilities of key groups, operating system, and composition and responsibilities of management team.

2.7.6 Implementing the Programme

Introduction

Implementation follows the same steps as designing the program. After getting the necessary funding, office arrangements, infrastructure, expertise and staffing:

(1) select product categories
(2) develop related criteria
(3) sell the program
(4) certify products
(5) license companies
(6) monitor compliance

However, having the technical aspect taken care of, you should also keep in mind that establishing credibility with and being relevant and responsive to the multiple stakeholders and consumers is paramount. The following points are worth consideration.

Program Flexibility

Ensuring program flexibility – remember that this is a marketing tool for your potential customers and that they are not looking for your program to have a regulatory, command and control mind-set. Program behaviour is often over-looked when setting out to implement the program. Key questions to always keep in mind:

- who are your clients (curiously enough they include business, government and consumers),
- what do they need (market advantage, a policy tool for environmental improvement, and information for decision making respectively), and
- how should you behave to satisfy their needs completely.

Stakeholder Criticism

Responding to Stakeholder Criticism – identifying environmental leadership, by definition, creates winners and losers in a 20-80 ratio. Expect criticism. But remember to learn from the criticisms. Addressing them properly and publicly may actually help promote the program.

Supply and Demand Strategies

Develop relationships with and promote your program to procurement professionals and the public as part of a strategy to create demand for your certification. Also, as part of your suppli strategy, sell your program directly to suppliers, manufacturers and distributors – they are one of your “client” groups. Work with the environmental leaders to help them build market share.

Monitoring Issues	Monitor International Issues – remain abreast of WTO and ISO developments in regard to Eco-labelling, stay in touch with colleague programs around the world, join the GEN and participate in their meetings and programs.
Patience	Demonstrate Patience – quick success is rare, time will be required.

3 Module B1 Textiles

3.1 Introduction

3.1.1 About this Module

Learning Objectives

Participants will:

- Learn about the EU Eco-label criteria for Textiles and verification method required
- Learn how to prepare and submit an application for an EU Eco-label
- Become familiar with the application process and how to obtain information about people and references to provide support
- Learn about collaboration possibilities with existing eco-labelling schemes and national certification/audit agencies that can facilitate the application process
- Be able to adapt and replicate the training and provide technical and practical support to industry applicants.

Programme (Agenda)

- Introduction – key documents and Eco-label website
- Application process for EU Eco-label
- Eco-label criteria
- LUNCH
- Eco-label criteria
- Exercises
- Legislation
- How to find new applicants
- Developing training approach

3.1.2 Relevant Documents and the EU Eco-Label Website

The Criteria Document

The 2002 Criteria Document

The textile criteria document
"COMMISSION DECISION of 15 May 2002 establishing the ecological criteria for the award of the Community eco-label to textile products and amending Decision 1999/178/EC (notified under document number C (2002) 1844) (Text with EEA relevance) (2002/371/EC)".

Exists in different languages: Portuguese, Chinese, and Spanish. A copy of the English version of the 2002 Criteria Document is in the Module B1 Resource Materials (Resource 1) and a hard copy is included with the Training Handbook.

Life Time of Criteria

Every criteria document has a certain "life time". The article 5 explains from and till when the criteria document is valid. There is always an overlap between old versions and new versions of criteria documents to secure, that licence keepers have a certain time to renew their licence according to the new version of the criteria document before their licence expires.

When the new version of the criteria document is not in place before the old version of the criteria document expires, the old version of the criteria document will be prolonged – see e.g. the textile criteria document which is prolonged for the second time (with 7 months (first prolongation was with 2 years).

In article 5 the "life-time" of the criteria document is described. The criteria document version from 2002 is thus valid from 1 June 2002 until 31 May 2007. Since the new version of the criteria document was not ready before 31 May 2007, the 2002-version was first prolonged until 31/5-09 and then again until

31/12-09. Electronic copies of the Commission's Decisions prolonging the criteria are included with the Module B1 Resource Materials (Resources 2 and 3) and hard copies are included with the Training Handbook.

Two Parts to Criteria Documents

Criteria documents for the Flower consist of two main parts: The Commission decision and the Annex. In the Commission decision the product group definition (article 2) and the "life time" of the criteria document (article 5) are given. The Annex starts with the aims of the criteria and some general statement about the assessment and verification requirement, but is mainly the actual criteria which the product has to fulfill to get the eco-label.

User Manual

Purpose

The purpose of the User Manual – or Application Pack, as it is also called – is to help the applicants with easy ways to document what they need, the give an overview of which sub-supplier needs to document what criteria, and the secure that all relevant documentation is gathered for each relevant part of the production chain.

An electronic copy of the User Manual in the Module B1 Resource Materials (Resource 4) and a hard copy is included with the Training Handbook.

Structure

The manual consists of three parts: An Introduction, Part A and Part B.

Introduction: is a short review of which products that can be awarded the Eco-label and how the application in order to get Eco-labelled textile products shall be made. Furthermore, it is shortly described how the application procedure is carried out.

Part A: is a general application form common for all product groups under the EU Eco-labelling scheme.

Part B: is specific for textile applications. It consists of five parts. First a general part and hereafter four parts which follow the division of the criteria document.

Chapters in Part B

- Chapter 1 that is a general part concerning description of the textile product, use of chemicals, an overview of suppliers as well as a flow diagram from fibre to final product.

- Chapter 2 (criteria no. 1-9) concerning requirements for the fibre production with specific requirements for each type of fibre.

- Chapter 3 (criteria no. 10-16, 17-25, 26-33) concerning the requirements for processes and consumption of chemicals from fibre to final product as well as reporting of energy and water consumption.

- Chapter 4 (criteria no. 34-39) concerning requirements for fitness for use.

- Chapter 5 (criteria no. 40) concerning requirements for information in connection with the Eco-label (box 2).

How to Use Part B

Part B is quite comprehensive in order to ease the work for the applicant and to ensure that no documentation is missing. All criteria and description of the necessary documentation as stated in the original criteria document are included in Part B. Each part contains prefabricated declarations and forms related to the individual criterion that the applicant or the supplier can fill in and return. All filled in declarations and forms have to be signed and stamped. In some cases test reports or material safety data sheets/user manuals are requested.

Information for each Criterion

The following headings exist for each criterion:

1. “Criterion” – the criterion is repeated literally in relation to the criteria document.

2. “Exceptions” – if the criterion only applies in certain cases, this is described. The text from the criteria document is repeated literally.

3. “Assessment and verification” – the necessary documentation to fulfill the individual criterion according to the criteria document is repeated literally here. Often the description can be detailed to ease the understanding.

4. “Test requirements” – the test method that according to the criteria document has to be used to fulfill the criteria is described literally as in the criteria document.

5. “The applicant must” – here is a description of what the applicant must do for each criterion.

That means it is described which declarations to be filled out by whom as well as which additional documentation material to be enclosed together with the declarations.

In cases where the interpretation of a criterion is difficult, the criterion is followed by a short explanatory text.

Completing Forms

In most cases not all criteria and by that not all forms will be relevant for the application in question. However, the applicant has to consider all requirements (with exception of requirements for fibres where only a few will be relevant). This is due to the circumstance that “no-use” certificates often have to be filled out even if the criterion in question is not relevant for the applied products. In order to ease the overview an index has been made where all declarations are listed so the relevant ones quickly can be found.

Background Document

Purpose

The background report describes the (technical) background for the changes made in the criteria document during the revision, which includes the results of the revision work in the form of the new criteria.

Structure

The background report is structured in the following chapters:

- Product group definition
- Current criteria and suggested changes
- New criteria
- Market update
- Textile criteria in other eco-labelling schemes
- Marketing and communication.

Please note that in chapter 1.2.1 there is guidance to the reader.

Chapter 2

Chapter 2 about the product group definition describes the expansion to also include exterior textiles and outdoor clothing as well as textile products with fillings, coatings and membranes.

Chapter 3

In Chapter 3 each of the existing criteria are reviewed. Some criteria have only briefly been discussed during the revision work, because no questions were raised as to their character and content. Others were heavily debated during the meetings in the ad hoc Working Group and also in between meetings. The report reflects the information gathered, the discussions and the final decision regarding the future wording of the individual criteria.

Chapters 4 and 5

Chapter 4 brings a description of the criteria developed because of the enlargement of the product group.

As the criteria document has undergone a major edition the numbers of the individual criteria have changed. To provide a quick overview of the changes, a table of such changes is presented in Chapter 5.

Chapters 6-8

Other tasks in the revision have been to make a market update, especially with respect to the new products to be included in the product group, to review textile criteria in other eco-labelling schemes and to give ideas to a future marketing and communication strategy. These elements are presented in chapters 6, 7 and 8.

The Criteria

In conclusion, the new criteria document for the award of the Community eco-label to textile products contains 40 specific criteria, divided into textile fibre, processes and chemicals, and fitness for use criteria.

The Eu Eco-Label Website

EU Eco-Label Website

Please see http://ec.europa.eu/environment/Eco-label/index_en.htm.

At this website you can find:

- Criteria documents,
- User Manuals
- Competent Bodies
- News
- Links – e.g. to other Eco-labels

Please see http://www.eco-label.com/default.htm

At this website you can find:

- Licence holders
- Potential customers

3.1.3 Introduction to EU Eco-Label Application Process

Getting Started

Who can apply for the EU Eco-label

Every European or non European company producing or selling products that enter in one of the product groups covered by the EU Eco-label scheme.

Applications for the Eco-label may be submitted by manufacturers, importers, services providers, traders and retailers. Traders and retailers may submit applications in respect of products placed on the traders market under their own brand names.

- If a product originates in a single Member State the application shall be presented in this Member State.
- If a product originates in the same form in several Member States the application may presented in one of those Member States.
- If a product originates outside the Community the application may be presented in any of the Member States in which the product is to be or has been placed on the market.

Does the product fall under the product group definition

How much does it cost

The fee varies from country to country, but below is a table showing the minimum and maximum fee allowed. There are some possibilities for reductions in the fee – these are shown at the right side of the table below.

	Minimum	Maximum	Reductions
Application fee covers the costs of processing the application.	EUR 300	EUR 1300	25% for SMEs and applicants from developing countries
	Minimum	**Maximum**	**Reductions**
Annual fee for the use of the label = 0.15% of annual volume of sales of the product within the Community	EUR 500per product group per applicant	EUR 25000per product group per applicant.	25% for SMEs and applicants from developing countries15% for companies registered under EMAS or certified under ISO 14001 Other reductions possible, please contact your Competent Body for further details.

The Process Steps

Step 1:

Applying for the EU Eco-label

Select the Eco-label product group for which you want to apply

Consult the product groups and criteria available here.

Contact a national Competent Body

- The Competent Body is an independent and neutral organization responsible for implementing the Community Eco-label award scheme at national level.
- The CB will analyse your needs and will give you technical support.

Case One: Your product is made in one of the EU Member States:

- Contact the CB of the country in which the product is made.

Case Two: Your product is made outside Europe:

- Contact the CB in the country / one of the countries where your product is sold.

Step 2a:

Building up your dossier

NB: Please note that first-hand information and early contact with your Competent Body is crucial and may pay off e.g. obtaining marketing support, reductions in fees, etc.

Please consult your Competent Body to request the necessary documents and application forms. Competent Bodies will inform you which test results must be provided and how the testing should be carried out. The EU Eco-label checklist may help you to manage your dossier.

The applicant must compile documentation for all relevant criteria for the product. For this purpose the manual contains pre-made forms of declarations and test reports stating the information needed for the application. Two different levels for declarations are often used; declarations from the applicant/producer and declarations from the supplier. In case where the supplier must provide information which he wants to be held confidential to the applicant it can be sent directly to the Competent Body, which is assigned to treat information confidential.

All relevant documentation has to be sent to the Competent Body together with the application. A copy of all material must be kept at the applicant.

The fee has to be paid (documentation for paid fee can also be practical to add to the application).

Step 2b:

Product Testing

The laboratory has to be certified under ISO 17025 or equivalent. For more information on the test method please contact the Competent Body.

It has to be accepted by the Competent Body.

The applicant must communicate all the required information on the laboratory to the CB.

List of certified laboratories here: http://ec.europa.eu/environment/Eco-label/Eco-labelled_products/pdf/get_products_tested_en.pdf (but also laboratories from www.oeko-tex.com or www.textranet.net might be useful)

Choice of test method

- The test method indicated in the criteria document and manual should in principle be used for testing.
- Test methods different from those reported into the criteria could be accepted only if it can be substantiated that the test method is equivalent with the required method. This includes as a minimum the same level of sensitivity of the method and that the test technically seen is carried out at the same stage in the life cycle and for exactly the same parameters as required in the criteria document.
- For those criteria where no specific test method is required the applicant must give information on the principles and sensitivity of the test method used.

Test periods and test frequency

- For a number of criteria only one test in relation to the application is required. However, it is the responsibility of the contract holder that the products are in continuous compliance with the Eco-labelling criteria. As the necessary test frequency depends on the way of production it must be explained how often samples for test are taken.
- For criteria where the annual average is not allowed to pass a given threshold, the annual average should as a minimum be based on three measurements.
- If more than one sample is taken during the same campaign, the average within each campaign can be used as one of the three samples that have to be taken during the year.

Step 2c:

Verification Process

Ecological and performance criteria for your products will be assessed, according to the documentation sent. – See the example of a check list from the Danish Competent Body provided as an electronic copy in the Module B1 Resource Materials (Resource 5).

Since it is most unlikely that everything is perfect, there must be expected some communication forth and back between the Competent Body and the applicant, where the applicant will have to answer questions, provide more or different documentation.

A visit of your manufacturing facility may be organised in order to ensure compliance with the criteria. – See the example of a check list from the Danish Competent Body provided as an electronic copy in the Module B1 Resource Materials (Resource 6).

When all requirements have been met, the Competent Body notifies the application in the European Commission who registers the contract.

Step 3a:

Receiving the EU Eco-label

If your product meets the requirements the CB will conclude a contract with you and award you the EU Eco-label. Then you can use the Eco-label logo on your products.

Depending on the size of your company and your country, you need to pay a fee. This covers marketing activities undertaken by the CB as well as the right to use the Eco-label on your products and for advertisement. (this text is from the EU Eco-label Website, many countries wants the fee to be paid before the start to handle the application)

Step 3b:

Compliance Monitoring

Factory inspections and product tests may be carried out by the CB at any time to ensure environmental excellence of Eco-labelled products to the consumers.

It is the responsibility of the contract holder that the products are in continuous compliance with the Eco-label criteria. As the necessary test frequency depends on the nature of the production, the CB will explain how often test samples are to be taken.

The contract holder or his supplier is responsible for keeping a journal on the test results and the relevant documentation. This documentation must be available at any time.

NB: If data shows that the product during the validity period no longer complies with the criteria, this must be reported to the Competent Body immediately together with a statement for the reasons for the non-compliance. The Competent Body will in each individual case decide the consequences of the non-compliance, e.g. a demand for additional measurements, suspension of the label etc.

Other Matters

Application Contract

At application the applicant must report the trade names and identification or reference numbers of the products in question. All chemicals used for the Eco-labelled product must be reported in the application, as well. When the application has been processed by the Competent Body, a contract specifying range of products and chemicals permitted will be granted.

It is recommended at the time of application to limit the number of chemicals and suppliers as far as possible, as this will ease the application procedure for the applicant considerably.

In case the contract holder wants to extend his range of products the following conditions apply:

- Extension with new identification/reference numbers, which do not affect the criteria, can be done without informing the Competent Body. However if new types of products or new brand names are included in the contract the Competent Body must be informed. The contract holder must keep the identification/reference numbers, which are included, in the dossier. The dossier must be available for the Competent Body on request.
- Extension with new chemicals, as far as these are affected by the criteria, must be approved by the Competent Body prior to use. This must be done by informing the Competent Body about the chemicals in question together with the necessary documentation for these. Besides an updated ‘List of Chemicals’ must be provided.
- Extension with new suppliers can be done by providing the Competent Body with documentation for the suppliers’ compliance with the criteria. Besides an updated list of suppliers must be provided.

Green Marketing

Enhance the value of the label by promoting your product via advertising and communication initiatives.

Ask the Competent Body for the available supporting measures. In addition to the activities of the Competent Bodies, the European Commission also supports and promotes the scheme on the European level.

Keep informed on the Flower with the news, promote your products on the Green Store and consult the Marketing guide to discover all opportunities you have to promote your products through the Flower.

Other relevant Eco-labelling schemes

These Eco-labels can be relevant to know of, in case a part of the supply chain has another label than the Flower.

GEN = Global Eco-labelling Network.
The Global Eco-labelling Network (GEN) is a non-profit association of third-party, environmental performance recognition, certification and labelling organizations founded in 1994 to improve, promote, and develop the "Eco-labelling" of products and services.
Here you can find almost every Eco-label.
http://www.globalEco-labelling.net/

Öko-Tex 100 and 1000 (only textiles).
The Oeko-Tex® Standard 100 was introduced at the beginning of the 1990s as a response to the needs of the general public for textiles which posed no risk to health. "Poison in textiles" and other negative headlines were widespread at this time and indiscriminately branded all chemical across the board used in textile manufacturing as negative and dangerous to health.
Öko-Tex 100 is a “health label”, where different unhealthy substances are measured in the final fabric.
Öko-Tex 1000 is also production oriented, but there are very few of them.
www.oeko-tex.com.

Nordic Swan.
Nordic Eco-labelling has the commission to promote a more sustainable consumerism with the goal of creating a sustainable society.
The Nordic Swan is also an Eco-label taking the whole life perspective into account (type I, like the Flower).
www.Eco-label.dk (show – push „English“)

Australian and New Zealand.
Good environmental Choice Australia: http://www.geca.org.au
Environmental Choice New Zealand: http://www.enviro-choice.org.nz
Closely based on the EU Eco-label, but not completely.

The Canadian Eco-label.
Founded in 1988 by the Government of Canada.
The EcoLogo Program is a Type I eco-label.
www.terrachoice.com or www.ecologo.org
No textile criteria

The German Blue Angel.
www.blauer-engel.de
Does not have criteria for textiles

3.1.4 About the EU-Flower Textiles Criteria

History of Development of Criteria

The First Criteria Document 1992

On March 23, 1992 the Council adopted a Council Regulation (EEC) No 880/92 on a Community eco-label award scheme.

Textile products was one of the first product groups, for which the establishing of eco-label criteria was started. The Danish Environmental Protection Agency was leading the first work, resulting in the Commission Decision of 22 April 1996 establishing the ecological criteria for the award of the Community eco-label to bed linen and T-shirts. This first criteria document was limited to the mentioned products, and only if they were made of cotton or cotton/polyester.

First Review 1999

During 1997-98 this first criteria document was revised by the Deutsches Wollforschungsinstitut (DWI) in co-operation with the Centro Studi Prato Ingegneria (PIN) and the Teppich-Forschungsinstitut (TFI). This revision work resulted in the current criteria document by Commission Decision of 17 February 1999 establishing the ecological criteria for the award of the Community eco-label to textile products. The product group was enlarged to clothing and interior textiles made of all textile fibres.

Review 2001-9

As the criteria document was valid for three years, the present revision work started in January 2001 in order to present a revised criteria document in due time before the expiration in February 2002.

The revision should look at a possible enlargement of the product group as well as examining the current criteria in order to decide whether the criteria should be prolonged, withdrawn or revised.

More and more products have been included in the product group definition over time. Both because there had been an interest and because the working group wanted to make it possible for more products to be able to get the Eco-label the Flower.

In article 5 the “life-time” of the criteria document is described. The criteria document version from 2002 is thus valid from 1 June 2002 until 31 May 2007. Since the new version of the criteria document was not ready before 31 May 2007, the 2002-version was first prolonged until 31/5-09 and then again until 31/12-09.

France was responsible for the revision and the new criteria document was voted positively in march 2009, but they are in writing moment not translated into all the languages of the member states, and there are no official application pack / user manual.

Revisions

1992: Commission Decision of 22 April 1996: T-shirts and bed linen.

1999: Commission Decision of 17 February 1999: Textiles

2002: Commission Decision of 15 May 2002: Textiles.

2009: Does not have a number or a date yet: Textiles.

An electronic copy of the 2009 Criteria Document is included in the Module B1 Resource Materials (Resource 7) and a hard copy is included with the Training Handbook.

Future Issues

A new revised criteria document has been voted positively in the Regulatory Committee, RC, where all the countries in EU are represented in March 2009.

In the moment of writing there are no public versions in other languages than English, no background document and no application pack / user manual available. Thus this training is based on the since 2002 existing criteria document, but for each criterion in the criteria document it will be pointed out how the changes according to the new criteria document are.

The trainers will therefore have to watch out at the EU Eco-labelling Website for new developments regarding the new version of the Flower textile criteria document.

The Product Group

Textiles

Be aware that at least 90 % by weight must be of textile fibres.

Product group definition

The product group definition tells which products are included and thus can get the Flower and is described in article 2:

The product group 'textile products' shall comprise:

- Textile clothing and accessories: clothing and accessories (such as handkerchiefs, scarves, bags, shopping bags, rucksacks, belts etc.) consisting of at least 90 % by weight of textile fibres;
- Interior textiles: textile products for interior use consisting of at least 90 % by weight of textile fibres. Wall and floor coverings are excluded;
- Fibres, yarn and fabric: intended for use in textile clothing and accessories or interior textiles.
- For 'textile clothing and accessories' and for 'interior textiles': down, feathers, membranes and coatings need not be taken into account in the calculation of the percentage of textile fibres.

Fibre Types

In the beginning of the annex of the criteria document it is stated that the criteria document specifies requirements for the following types of fibre:

- acrylic
- cotton and other natural cellulosic seed fibres
- elastane
- flax and other bast fibres,
- greasy wool and other keratin fibres,
- man-made cellulose fibres,
- polyamide, polyester and polypropylene.

Other fibres for which no specific criteria are set are also allowed, with the exception of mineral fibres, glass fibres, metal fibres, carbon fibres and other inorganic fibres.

The fibre specific criteria for a given fibre type need not be met if that fibre type contributes to less than 5% of the total weight of the textile fibre in the product.

Similarly they need not be met if the fibres are of recycled origin. In this context recycled fibre are defined as fibres originating only from cuttings from textile and clothing manufacturers or from post-consumer waste (textile or otherwise).

Nevertheless, at least 85% by weight of all fibres in the product must either be in compliance with the corresponding fibre specific criteria, if any, or of recycled origin.

2009 Criteria Document

No changes.

3.2 The Criteria

3.2.1 Fibres

Criterion 1: Acrylic

EU Eco-label Criterion	(a) The residual acrylonitrile content in raw fibres leaving the fibre production plant shall be less than 1,5 mg/kg. *Assessment and verification:* The applicant shall provide a test report, using the following test method: extraction with boiling water and quantification by capillary gas-liquid chromatography. (b) The emissions to air of acrylonitrile (during polymerisation and up to the solution ready for spinning), expressed as an annual average, shall be less than 1 g/kg of fibre produced. *Assessment and verification:* The applicant shall provide detailed documentation and/or test reports showing compliance with this criterion, together with a declaration of compliance.
Comments	This means that measurements of the emissions to air are needed and if the emission is over the limit, some kind of emission reduction is needed.
2009 Criteria Document	No changes.

Criterion 2: Cotton and other natural cellulosic seed fibres (including kapok)

EU Eco-label Criterion: **Pesticide limits**	Cotton and other natural cellulosic seed fibres (hereinafter referred to as cotton) shall not contain more than 0,05 ppm (sensibility of the test method permitting) of each of the following substances: aldrin, captafol, chlordane, DDT, dieldrin, endrin, heptachlor, hexachlorobenzene, hexachlorocyclohexane (total isomers), 2,4,5-T, chlordimeform, chlorobenzilate, dinoseb and its salts, monocrotophos, pentachlorophenol, toxaphene, methamidophos, methylparathion, parathion, phosphamidon.
Comments	The measuring of pesticides on the cotton is not a one-time-fulfilled criterion; a procedure for testing is needed. This procedure might be depending on how much cotton is bought and which procedures are already in place for the company (e.g. for each lot of cotton or two times a year if more than two lots of cotton per year are received). Besides that it is important to specify that the test should be made on raw cotton before it comes through any wet treatment.
2009 Criteria Document	Specify that the test should be made on raw cotton before it comes through any wet treatment, for each lot of cotton or two times a year if more than two lots of cotton per year are received.
Example/ Questions/ mini exercise	Why do you think it is important to make the tests on raw cotton?
EU Eco-label Criterion:	This requirement does not apply where more than 50 % of the cotton content is organically grown cotton or transitional cotton, that is to say certified by an independent organization to have been produced in conformity with the

Exception 1	production and inspection requirements laid down in Council Regulation (EEC) No 2092/91 of 24 June 1991 on organic production of agricultural products and indications referring thereto on agricultural products and foodstuffs.
Comments	This exception is made to try to make it more attractive to use organic cotton. Transitional cotton are cotton un it´s way to become organic
2009 Criteria Document	New Regulation for organic cotton: No 834/2007 of 28 June 2007 on organic production and labelling of organic products and repealing Regulation (EEC) No 2092/91.
EU Eco-label Criterion: **Exception 2**	This requirement does not apply if documentary evidence can be presented that establishes the identity of the farmers producing at least 75 % of the cotton used in the final product, together with a declaration from these farmers that the substances listed above have not been applied to the fields or cotton plants producing the cotton in question, or to the cotton itself.
Comments	This criterion actually allow “not-certified organic cotton”, if the farmers are known. The back ground was that one of the later applicants on the first version of the textile criteria document had such cotton suppliers.
2009 Criteria Document	No changes.
EU Eco-label Criterion: **Organic labelling**	Where 100 % of the cotton is organic, that is to say certified by an independent organization to have been produced in conformity with the production and inspection requirements laid down in Regulation (EEC) No 2092/91 the applicant may place the mention ‘organic cotton’ next to the eco-label. The applicant shall either provide proof of organic certification or documentation relating to the non-use by the farmers or a test report, using the following test methods: as appropriate, US EPA 8081 A (organo-chlorine pesticides, with ultrasonic or Soxhlet extraction and apolar solvents (iso-octane or hexane)), 8151 A (chlorinated herbicides, using methanol), 8141 A (organophosphorus compounds), or 8270 C (semi-volatile organic compounds).
2009 Criteria Document	The limit is now 95% New Regulation for organic production New text: „Where between 70% and 95% of the cotton in one product is organic, it may be labelled „made with xy% organic cotton““.

Criterion 3: Elastane

EU Eco-label Criterion	(a) Organotin compounds shall not be used. Assessment and verification: The applicant shall provide a declaration of non-use. (b) The emissions to air of aromatic diisocyanates during polymerisation and spinning, expressed as an annual average, shall be less than 5 mg/kg of fibre produced. Assessment and verification: The applicant shall provide detailed documentation

	and/or test reports showing compliance with this criterion, together with a declaration of compliance.
Comments	This means that measurements of the emissions to air are needed and if the emission is over the limit, some kind of emission reduction is needed.
2009 Criteria Document	Slightly new text in b: The emissions to air of aromatic diisocyanates during polymerisation and fibre production, measured at the process steps where they occur, including fugitive emissions as well expressed as an annual average, shall be less than 5 mg/kg of fibre produced.
Example/ Questions/ mini exercise	Think about how you control/document that a substance is NOT used.

Criterion 4: Flax and other bast fibres (including hemp, jute, and ramie)

EU Eco-label Criterion	Flax and other bast fibres shall not be obtained by water retting, unless the waste water from the water retting is treated so as to reduce the COD or TOC by at least 75 % for hemp fibres and by at least 95 % for flax and the other bast fibres. Assessment and verification: If water retting is used, the applicant shall provide a test report, using the following test method: ISO 6060 (COD).
Comments	This means that treating of the water is needed, so if Flax or other bast fibres are used, start by checking if water treatment is done.
2009 Criteria Document	No changes.
Example/ Questions/ mini exercise	What technical measurements does this criterion put on the fibre producer?

Criterion 5: Greasy wool and other keratin fibres (including wool from sheep, camel, alpaca, goat)

EU Eco-label Criterion: **Pesticide limits**	(a) The sum total content of the following substances shall not exceed 0,5 ppm: γ-hexachlorocyclohexane (lindane), α-hexachlorocyclohexane, β-hexachlorocyclohexane, δ-hexachlorocyclohexane, aldrin, dieldrin, endrin, p,p'-DDT, p,p'-DDD. (b) The sum total content of the following substances shall not exceed 2 ppm: diazinon, propetamphos, chlorfenvinphos, dichlorfenthion, chlorpyriphos, fenchlorphos. (c) The sum total content of the following substances shall not exceed 0,5 ppm: cypermethrin, deltamethrin, fenvalerate, cyhalothrin, flumethrin. (d) The sum total content of the following substances shall not exceed 2 ppm: diflubenzuron, triflumuron. Assessment and verification for (a), (b), (c) and (d): The applicant shall either provide the documentation indicated above or provide a test report, using the following test method: IWTO Draft Test Method 59.

2009 Criteria Document	Changes for b: Two new pesticides added: ethion – pirimphos-methyl Change for d: One new pesticide added: dicyclanil Specify that the test should be made on raw wool, before it comes through any wet treatment, two times a year if more than two lots of wool per year are received.
EU Eco-label Criterion: **Exemption**	These requirements (as detailed in (a), (b), (c) and (d) and taken separately) do not apply if documentary evidence can be presented that establishes the identity of the farmers producing at least 75 % of the wool or keratin fibres in question, together with a declaration from these farmers that the substances listed above have not been applied to the fields or animals concerned.
Comments	This should make it easier for smaller wool producers to be part of a Flower labeled supply chain.
2009 Criteria Document	No changes.
EU Eco-label Criterion: **Scouring effluent**	(e) For scouring effluent discharged to sewer, the COD discharged to sewer shall not exceed 60 g/kg greasy wool, and the effluent shall be treated off-site so as to achieve at least a further 75 % reduction of COD content, expressed as an annual average. For scouring effluent treated on site and discharged to surface waters, the COD discharged to surface waters shall not exceed 5 g/kg greasy wool. The pH of the effluent discharged to surface waters shall be between 6 and 9 (unless the pH of the receiving waters is outside this range), and the temperature shall be below 40 °C (unless the temperature of the receiving water is above this value). Assessment and verification: The applicant shall provide relevant data and test report, using the following test method: ISO 6060.
Comments	Scouring is the washing of the wool. This means that treating of the water is needed, so if wool or other keratin fibres are used, start by checking if water treatment is done.
2009 Criteria Document	New COD-limit: 45 g/kg Added specification: The wool scouring plant shall describe, in detail, their treatment of the scouring effluent and continuously monitor the COD-levels.

Criterion 6: Man-made cellulose fibres (including viscose, lyocell, acetate, cupro, triacetate)

EU Eco-label Criterion: **AOX**	(a) The level of AOX in the fibres shall not exceed 250 ppm. Assessment and verification: The applicant shall provide a test report, using the following test method: ISO 11480.97 (controlled combustion and microcoulometry).
Comments	AOX = Absorbable Organic Halides, analysis of chlorinated halogens
2009 Criteria	No changes

Document	
EU Eco-label Criterion: **Viscose: Sulphur emission (air)**	(b) For viscose fibres, the sulphur content of the emissions of sulphur compounds to air from the processing during fibre production, expressed as an annual average, shall not exceed 120 g/kg filament fibre produced and 30 g/kg staple fibre produced. Where both types of fibre are produced on a given site, the overall emissions must not exceed the corresponding weighted average. Assessment and verification: The applicant shall provide detailed documentation and/or test reports showing compliance with this criterion, together with a declaration of compliance.
Comments	This means that measurements of the emissions to air are needed and if the emission is over the limit, some kind of emission reduction is needed.
2009 Criteria Document	No changes.
EU Eco-label Criterion: **Viscose: Zink emission (water)**	(c) For viscose fibres, the emission to water of zinc from the production site, expressed as an annual average, shall not exceed 0,3 g/kg. Assessment and verification: The applicant shall provide detailed documentation and/or test reports showing compliance with this criterion, together with a declaration of compliance.
Comments	This means that measurements of the emissions to water are needed and if the emission is over the limit, some kind of emission reduction is needed.
2009 Criteria Document	No changes.
EU Eco-label Criterion: **Exemption**	(d) For cupro fibres, the copper content of the effluent water leaving the site, expressed as an annual average, shall not exceed 0,1 ppm. Assessment and verification: The applicant shall provide detailed documentation and/or test reports showing compliance with this criterion, together with a declaration of compliance.
Comments	This means that measurements of the emissions to water are needed and if the emission is over the limit, some kind of emission reduction is needed.
2009 Criteria Document	No changes.

Criterion 7: Polyamide

EU Eco-label Criterion	The emissions to air of N2O during monomer production, expressed as an annual average, shall not exceed 10 g/kg polyamide 6 fibre produced and 50 g/kg polyamide 6,6 produced. Assessment and verification: The applicant shall provide detailed documentation and/or test reports showing compliance with this criterion, together with a declaration of compliance.
Comments	This means that measurements of the emissions to air are needed and if the

	emission is over the limit, some kind of emission reduction is needed.
2009 Criteria Document	No changes

Criterion 8: Polyester

EU Eco-label Criterion: **Antimony**	(a) The amount of antimony in the polyester fibres shall not exceed 260 ppm. Where no antimony is used, the applicant may state 'antimony free' (or equivalent text) next to the eco-label. Assessment and verification: The applicant shall either provide a declaration of non-use or a test report using the following test method: direct determination by Atomic Absorption Spectrometry. The test shall be carried out on the raw fibre prior to any wet processing.
Comments	Allowing to state "antimony free" is hoped to also increase the knowledge of the consumers (that polyester might contain antimony).
2009 Criteria Document	No changes
Example/ Questions/ mini exercise	Why is the statement "antimony free" allowed?
EU Eco-label Criterion: **VOC**	(b) The emissions of VOCs during polymerization of polyester, expressed as an annual average, shall not exceed 1,2 g/kg of produced polyester resin. (VOCs are any organic compound having at 293,15 K a vapour pressure of 0,01 kPa or more, or having a corresponding volatility under the particular conditions of use). Assessment and verification: The applicant shall provide detailed documentation and/or test reports showing compliance with this criterion, together with a declaration of compliance.
Comments	VOC = volatile organic compounds. This means that measurements of the emissions to air are needed and if the emission is over the limit, some kind of emission reduction is needed.
2009 Criteria Document	No changes

Criterion 9: Polypropylene

EU Eco-label Criterion	Lead-based pigments shall not be used. Assessment and verification: The applicant shall provide a declaration of non-use.
2009 Criteria Document	No changes.

3.2.2 Processes and Chemicals

General	The criteria in this section apply, where appropriate, to all stages of production of

the product, including the production of the fibres. It is nevertheless accepted that recycled fibres may contain some of the dyes or other substances excluded by these criteria, but only if they were applied in the previous life-cycle of the fibres.

Comments

That means that these criteria always have to be controlled for their relevance, they do not necessarily refer to a specific sub-producer or a like.

2009 Criteria Document

No changes.

Criterion 10: Auxiliaries and finishing agents for fibres and yarns

EU Eco-label Criterion:

Size

(a) Size: At least 95 % (by dry weight) of the component substances of any sizing preparation applied to yarns shall be sufficiently biodegradable or eliminable in wastewater treatment plants, or else shall be recycled.

Assessment and verification: In this context, a substance is considered as 'sufficiently biodegradable or eliminable':

- if when tested with one of the methods OECD 301 A, OECD 301 E, ISO 7827, OECD 302 A, ISO 9887, OECD 302 B, or ISO 9888 it shows a percentage degradation of at least 70 % within 28 days,
- or if when tested with one of the methods OECD 301 B, ISO 9439, OECD 301 C, OECD 302 C, OECD 301 D, ISO 10707, OECD 301 F, ISO 9408, ISO 10708 or ISO 14593 it shows a percentage degradation of at least 60 % within 28 days,
- or if when tested with one of the methods OECD 303 or ISO 11733 it shows a percentage degradation of at least 80 % within 28 days,

— or, for substances for which these test methods are inapplicable, if evidence of an equivalent level of biodegradation or elimination is presented.

The applicant shall provide appropriate documentation, safety data sheets, test reports and/or declarations, indicating the test methods and results as above, and showing compliance with this criterion for all sizing preparations used.

Comments

Be aware, that some of the tests also have "common" names. E.g. is a Zahn-Wellen test the same as an OECD 302B.

2009 Criteria Document

Text right at the end of the a-criterion:

"The sum of each component is taken into account."

EU Eco-label Criterion:

Spinning chemicals

(b) Spinning solution additives, spinning additives and preparation agents for primary spinning (including carding oils, spin finishes and lubricants): At least 90 % (by dry weight) of the component substances shall be sufficiently biodegradable or eliminable in waste water treatment plants.

This requirement does not apply to preparation agents for secondary spinning (spinning lubricants, conditioning agents), coning oils, warping and twisting oils, waxes, knitting oils, silicone oils and inorganic substances.

Assessment and verification: 'Sufficiently biodegradable or eliminable' is as defined above in part (a). The applicant shall provide appropriate documentation, safety data sheets, test reports and/or declarations, indicating the test methods and results as above, and showing compliance with this criterion for all such additives or preparation agents used.

2009 Criteria Document	Text right after the b-criterion: "The sum of each component is taken into account."
EU Eco-label Criterion:	(c) The content of polycyclic aromatic hydrocarbons (PAH) in the mineral oil proportion of a product shall be less than 1,0 % by weight.
PAH in mineral oil	Assessment and verification: The applicant shall provide appropriate documentation, safety date sheets, product information sheets or declarations, indicating either the content of polycyclic aromatic hydrocarbons or the non-use of products containing mineral oils.
Comments	Seems to be difficult to achieve.
2009 Criteria Document	Limit changed till 3% PAH.

Criterion 11: Biocidal or biostatic products

EU Eco-label Criterion: **Transportation and storage**	(a) Chlorophenols (their salts and esters), PCB and organotin compounds shall not be used during transportation or storage of products and semi-manufactured products. Assessment and verification: The applicant shall provide a declaration of non-use of these substances or compounds on the yarn, fabric and final product. Should this declaration be subject to verification the following test method and threshold shall be used: extraction as appropriate, derivatisation with acetic anhydride, determination by capillary gas-liquid chromatography with electron capture detection, limit value 0,05 ppm.
Comments	This criterion is thus relevant for every transportation and storage from the production of the fibres to the end product.
2009 Criteria Document	No changes.
Example/ Questions/ mini exercise	Give examples of where in the production chain this might be relevant.
EU Eco-label Criterion:	(b) Biocidal or biostatic products shall not be applied to products so as to be active during the use phase.
Biocides active in the use phase	Assessment and verification: The applicant shall provide a declaration of non-use.
Comments	Examples of this could be for sports clothes where no bacteria growth in sweat is wanted.
2009 Criteria Document	This criterion is taken out. BUT see article 1: Some biocides ok if aiming at protecting human health – as e.g. malaria tents.

Criterion 12: Stripping or depigmentation

EU Eco-label Criterion	Heavy metal salts (except of iron) or formaldehyde shall not be used for stripping or depigmentation. Assessment and verification: The applicant shall provide a declaration of non-use.
Comments	Stripping and depigmentation is processes for de-colouring.
2009 Criteria Document	No changes.

Criterion 13: Weighting

EU Eco-label Criterion	Compounds of cerium shall not be used in the weighting of yarn or fabrics. Assessment and verification: The applicant shall provide a declaration of non-use.
Comments	Weighting is common for silk to make the quality feel better.
2009 Criteria Document	No changes.

Criterion 14: Auxiliary chemicals

EU Eco-label Criterion	Alkylphenolethoxylates (APEOs), linear alkylbenzene sulfonates (LAS), bis(hydrogenated tallow alkyl) dimethyl ammonium chloride (DTDMAC), distearyl dimethyl ammonium chloride (DSDMAC), di(hardened tallow) dimethyl ammonium chloride (DHTDMAC), ethylene diamine tetra acetate (EDTA), and diethylene triamine penta acetate (DTPA) shall not be used and shall not be part of any preparations or formulations used. Assessment and verification: The applicant shall provide a declaration of non-use.
Comments	This criterion is thus relevant for every chemical used in the whole production chain.
2009 Criteria Document	No changes.
Example/ Questions/ mini exercise	What does the heading of this criterion indicate?

Criterion 15: Detergents, fabric softeners and complexing agents

EU Eco-label Criterion	At each wet-processing site, at least 95 % by weight of the detergents, at least 95 % by weight of fabric softeners and at least 95 % by weight complexing agents used shall be sufficiently degradable or eliminable in wastewater treatment plants. Assessment and verification: 'Sufficiently biodegradable or eliminable' is as defined above in the criterion related to auxiliaries and finishing agents for fibres

	and yarns. The applicant shall provide appropriate documentation, safety data sheets, test reports and/or declarations, indicating the test methods and results as above, and showing compliance with this criterion for all detergents, fabric softeners and complexing agents used.
2009 Criteria Document	Text changed so it is 95% of the sum (not for each).

Criterion 16: Bleaching agents

EU Eco-label Criterion	In general, AOX emissions in the bleaching effluent shall be less than 40 mg Cl/kg. In the following cases, the level shall be less than 100 mg Cl/kg: — linen and other bast fibres, — cotton, which has a degree of polymerization below 1 800, and which is intended for white end products. This requirement does not apply to the production of man-made cellulose fibres. The applicant shall either provide a declaration of non-use of chlorinated bleaching agents or provide a test report using the following test method: ISO 9562 or prEN 1485.
Comments	AOX = Absorbable Organic Halides, analysis of chlorinated halogens This criterion means in practice that chlorine bleaching is very difficult to do.
2009 Criteria Document	Chlorine agents are excluded for bleaching yarns, fabrics and end products.
Example/ Questions/ mini exercise	Which criterion (old or new) is the clearest?

Criterion 17: Impurities in dyes

EU Eco-label Criterion	The levels of ionic impurities in the dyes used shall not exceed the following: Ag 100 ppm; As 50 ppm; Ba 100 ppm; Cd 20 ppm; Co 500 ppm; Cr 100 ppm; Cu 250 ppm; Fe 2 500 ppm; Hg 4 ppm; Mn 1 000 ppm; Ni 200 ppm; Pb 100 ppm; Se 20 ppm; Sb 50 ppm; Sn 250 ppm; Zn 1 500 ppm. Any metal that is included as an integral part of the dye molecule (e.g. metal complex dyes, certain reactive dyes, etc.) shall not be considered when assessing compliance with these values, which only relate to impurities. The applicant shall provide a declaration of compliance.
2009 Criteria Document	No changes.

Criterion 18: Impurities in pigments

EU Eco-label Criterion	The levels of ionic impurities for pigments used shall not exceed the following: As 50 ppm; Ba 100 ppm, Cd 50 ppm; Cr 100 ppm; Hg 25 ppm; Pb 100 ppm; Se 100

	ppm Sb 250 ppm; Zn 1 000 ppm. The applicant shall provide a declaration of compliance.
2009 Criteria Document	No changes.

Criterion 19: Chrome mordant dyeing

EU Eco-label Criterion	Chrome mordant dyeing is not allowed. The applicant shall provide a declaration of non-use.
2009 Criteria Document	No changes.

Criterion 20: Metal complex dyes

EU Eco-label Criterion: **Metal complex dyes not fixing to the textile**	If metal complex dyes based on copper, chromium or nickel are used: (a) In case of cellulose dyeing, where metal complex dyes are part of the dye recipe, less than 20 % of each of those metal complex dyes applied (input to the process) shall be discharged to waste water treatment (whether on-site or off-site). In case of all other dyeing processes, where metal complex dyes are part of the dye recipe, less than 7 % of each of those metal complex dyes applied (input to the process) shall be discharged to waste water treatment (whether on-site or off-site). The applicant shall either provide a declaration of non-use or documentation and test reports using the following test methods: ISO 8288 for Cu, Ni; ISO 9174 or prEN 1233 for Cr.
Comments	This criterion is only relevant if metal complex dyes (of copper, chromium or nickel) are used. Calculation must be done for each of the metal complex dye in the recipe – for cellulose dying the limit is 20%, for all other dying the limit is 7%.
2009 Criteria Document	No changes.
Example/ Questions/ mini exercise	How would you prove continuously fulfilment of this criterion?
EU Eco-label Criterion: **Metal complex dyes emission to water**	If metal complex dyes based on copper, chromium or nickel are used: (b) The emissions to water after treatment shall not exceed: Cu 75 mg/kg (fibre, yarn or fabric); Cr 50 mg/kg; Ni 75 mg/kg. The applicant shall either provide a declaration of non-use or documentation and test reports using the following test methods: ISO 8288 for Cu, Ni; ISO 9174 or prEN 1233 for Cr.
Comments	This criterion is only relevant if metal complex dyes are used.
2009 Criteria Document	No changes.

Criterion 21: Azo dyes

EU Eco-label Criterion

Azo dyes shall not be used that may cleave to any one of the following aromatic amines:

4-aminodiphenyl (92-67-1)

Benzidine (92-87-5)

4-chloro-o-toluidine (95-69-2)

2-naphthylamine (91-59-8)

o-amino-azotoluene (97-56-3)

2-amino-4-nitrotoluene (99-55-8)

p-chloroaniline (106-47-8)

2,4-diaminoanisol (615-05-4)

4,4'-diaminodiphenylmethane (101-77-9)

3,3'-dichlorobenzidine (91-94-1)

3,3'-dimethoxybenzidine (119-90-4)

3,3'-dimethylbenzidine (119-93-7)

3,3'-dimethyl-4,4'-diaminodiphenylmethane (838-88-0)

p-cresidine (120-71-8)

4,4'-methylene-bis-(2-chloraniline) (101-14-4)

4,4'-oxydianiline (101-80-4)

4,4'-thiodianiline (139-65-1)

o-toluidine (95-53-4)

2,4-diaminotoluene (95-80-7)

2,4,5-trimethylaniline (137-17-7)

4-aminoazobenzene (60-09-3)

o-anisidine (90-04-0)

Assessment and verification: The applicant shall provide a declaration of non-use of these dyes. Should this declaration be subject to verification the following test method and threshold shall be used: German method B-82.02 or French method XP G 08-014, 30 ppm threshold. (Note: false positives may be possible with respect to the presence of 4-aminoazobenzene, and confirmation is therefore recommended).

Comments

It means that azo dyes decomposing to carcinogenic amines must not be used.

2009 Criteria Document

One taken out: 4,4'-methylene-bis-(2-chloraniline) (101-14-4)

Two new added: 2,4-Xylidine and 2,6-Xylidine.

Criterion 22: Dyes that are carcinogenic, mutagenic or toxic to reproduction

EU Eco-label Criterion

(a) The following dyes shall not be used:

C.I. Basic Red 9

C.I. Disperse Blue 1

C.I. Acid Red 26

C.I. Basic Violet 14

C.I. Disperse Orange 11

C. I. Direct Black 38

C. I. Direct Blue 6

C. I. Direct Red 28

C. I. Disperse Yellow 3

Assessment and verification: The applicant shall provide a declaration of non-use of such dyes.

(b) No use is allowed of dye substances or of dye preparations containing more than 0,1 % by weight of substances that are assigned or may be assigned at the time of application any of the following risk phrases (or combinations thereof):

R40 (limited evidence of a carcinogenic effect),

R45 (may cause cancer),

R46 (may cause heritable genetic damage),

R49 (may cause cancer by inhalation),

R60 (may impair fertility),

R61 (may cause harm to the unborn child),

R62 (possible risk of impaired fertility),

R63 (possible risk of harm to the unborn child),

R68 (possible risk of irreversible effects),

as laid down in Council Directive 67/548/EEC of 27 June 1967 on the approximation of the laws, regulations and administrative provisions relating to the classification, packaging and labelling of dangerous substances (1), and its subsequent amendments.

Assessment and verification: The applicant shall provide a declaration of non-use of such dyes.

Comments

Be aware that a new classification system is on it´s way: GHS=Globally Harmonized System.

The Globally Harmonized System of Classification and Labelling of Chemicals (GHS) is the new global classification system which is expected to be implemented in EU as a regulation in 2008. The new regulation will in time replace the current substance- and preparation regulations (67/548/EEC and 1999/45/EC), which is expected to be annulled from 2015. The transition period between the two regulations is expected to be as follows: Classification of substances before 1st of December 2010 must be classified after the 67-regulation, but after the 1st of December 2010 according to the GHS system. For classification of preparations is the corresponding date the 1st of June 2015. In the period 2010 to 2015 substances must be classified after both systems and labelled and packed according to the GHS regulation.

2009 Criteria Document	Added R-phrases according to GHS-system.

Criterion 23: Potentially sensitising dyes

EU Eco-label Criterion	The following dyes shall only be used if the fastness to perspiration (acid and alkaline) of the dyed fibres, yarn or fabric is at least 4: C.I. Disperse Blue 3 C.I. 61 505 C.I. Disperse Blue 7 C.I. 62 500 C.I. Disperse Blue 26 C.I. 63 305 C.I. Disperse Blue 35 C.I. Disperse Blue 102 C.I. Disperse Blue 106 C.I. Disperse Blue 124 C.I. Disperse Orange 1 C.I. 11 080 C.I. Disperse Orange 3 C.I. 11 005 C.I. Disperse Orange 37 C.I. Disperse Orange 76 (previously designated Orange 37) C.I. Disperse Red 1 C.I. 11 110 C.I. Disperse Red 11 C.I. 62 015 C.I. Disperse Red 17 C.I. 11 210 C.I. Disperse Yellow 1 C.I. 10 345 C.I. Disperse Yellow 9 C.I. 10 375 C.I. Disperse Yellow 39 C.I. Disperse Yellow 49 Assessment and verification: The applicant shall either provide a declaration of non-use of these dyes or a test report using the following test method for colour fastness: ISO 105-E04 (acid and alkaline, comparison with multi-fibre fabric).
2009 Criteria Document	Wording changed to„shall not be used“ – which means a total ban on these dyes. Adding one new: C.I. Disperse Brown 1.

Criterion 24: Halogenated carriers for polyester

EU Eco-label Criterion	Halogenated carriers shall not be used. Assessment and verification: The applicant shall provide a declaration of non-use.
2009 Criteria Document	No changes

Criterion 25: Printing

EU Eco-label Criterion: **VOC**	(a) Printing pastes used shall not contain more than 5 % volatile organic compounds (VOCs: any organic compound having at 293,15 K a vapour pressure of 0,01 kPa or more, or having a corresponding volatility under the particular conditions of use). Assessment and verification: The applicant shall either provide a declaration that no printing has been made or provide appropriate documentation showing compliance together with a declaration of compliance.
2009 Criteria Document	No changes.
EU Eco-label Criterion: **Plasticol**	(b) Plastisol-based printing is not allowed. Assessment and verification: The applicant shall either provide a declaration that no printing has been made or provide appropriate documentation showing compliance together with a declaration of compliance.
Comments	This actually means that PVC printing is not allowed.
2009 Criteria Document	No changes.

Criterion 26: Formaldehyde

EU Eco-label Criterion	The amount of free and partly hydrolysable formaldehyde in the final fabric shall not exceed 30 ppm for products that come into direct contact with the skin, and 300 ppm for all other products. Assessment and verification: The applicant shall either provide a declaration that formaldehyde containing products have not been applied or provide a test report using the following test method: EN ISO 14184-1.
Comments	Normally formaldehyde releasing substances are used on fabric, but formaldehyde releasing dye fastness improvers are sometimes used, which means that they could be used in connection with yarn dyeing as well. Formaldehyde should add to effects like e.g. “iron free”. Formaldehyde is suspected to be carcinogen. This should be especially relevant if you iron (= warm up the textile) and inhale it (e.g. if you don’t find that the “iron free” shirt has to be ironed anyway).
2009 Criteria Document	Added: 20 ppm in products for babies and young children under 3 years old Changed: From 300 ppm to 75 ppm for „all other products“.

Criterion 27: Waste water discharges from wet-processing

EU Eco-label Criterion	(a) Waste water from wet-processing sites (except greasy wool scouring sites and flax retting sites) shall, when discharged to surface waters after treatment (whether on-site or off-site), have a COD content of less than 25 g/kg, expressed as an annual average. Assessment and verification: The applicant shall provide detailed documentation and test reports, using ISO 6060, showing compliance with this criterion, together

with a declaration of compliance.

(b) If the effluent is treated on site and discharged directly to surface waters, it shall also have a pH between 6 and 9 (unless the pH of the receiving water is outside this range) and a temperature of less than 40 °C (unless the temperature of the receiving water is above this value).

Assessment and verification: The applicant shall provide documentation and test reports showing compliance with this criterion, together with a declaration of compliance.

Comments

This is a very central criterion: If there is no water treatment available already, where the wet-processing takes place, it will be almost impossible to come through with an application. It will take long time to install a functioning water treatment, so the only realistic alternative is to find another place to make that part of the production. Almost everything else can be solved (maybe with some limitations) in the application.

2009 Criteria Document

New limit fort he COD (under a): 20 g/kg.

Criterion 28: Flame retardants

EU Eco-label Criterion

No use is allowed of flame retardant substances or of flame retardant preparations containing more than 0,1 % by weight of substances that are assigned or may be assigned at the time of application any of the following risk phrases (or combinations thereof):

R40 (limited evidence of a carcinogenic effect),

R45 (may cause cancer),

R46 (may cause heritable genetic damage),

R49 (may cause cancer by inhalation),

R50 (very toxic to aquatic organisms),

R51 (toxic to aquatic organisms),

R52 (harmful to aquatic organisms),

R53 (may cause long-term adverse effects in the aquatic environment),

R60 (may impair fertility),

R61 (may cause harm to the unborn child),

R62 (possible risk of impaired fertility),

R63 (possible risk of harm to the unborn child),

R68 (possible risk of irreversible effects),

as laid down in Directive 67/548/EEC and its subsequent amendments.

This requirement does not apply to flame retardants that on application change their chemical nature to no longer warrant classification under any of the R-phrases listed above, and where less than 0,1 % of the flame retardant on the treated yarn or fabric remains in the form as before application.

Assessment and verification: The applicant shall either provide a declaration that flame retardants have not been used, or indicate which flame retardants have been used and provide documentation (such as safety data sheets) and/or declarations indicating that those flame retardants comply with this criterion.

Comments	For your awareness: There is special legislation in England that demands that there are flame retardants in bed linen and pyjamas. It should be because there had been many cases with fire and death because of people falling asleep in their bed with a cigarette light.
2009 Criteria Document	Only flame retardants that are chemically bound into the polymer fibre or onto the fibre surface (reactive flame retardants) may be used in the product. If the flame retardants used have any of the R-phrases listed below, these reactive flame retardants should, on application, change their chemical nature to no longer warrant classification under any of these R-phrases. (Less than 0.1% of the flame retardant on the treated yarn or fabric may remain in the form as before application.) - But same R-phrases. Taken out: This requirement does not apply to flame retardants that on application change their chemical nature to no longer warrant classification under any of the R-phrases listed above, and where less than 0,1 % of the flame retardant on the treated yarn or fabric remains in the form as before application. Added: Flame retardants which are only physically mixed into the polymer fibre or into a textile coating are excluded (additive flame retardants). Added: New according to GHS-system

Criterion 29: Shrink resistant finishes

EU Eco-label Criterion	Halogenated shrink-resist substances or preparations shall only be applied to wool slivers. Assessment and verification: The applicant shall provide a declaration of non-use (unless used for wool slivers).
2009 Criteria Document	Is replaced with new criterion: **Anti felting finishes** Halogenated substances or preparations shall only be applied to wool slivers and loose scoured wool. *Assessment and verification:* The applicant shall provide a declaration of non-use (unless used for wool slivers and loose scoured wool). But this “old 29” is part of new 30.

Criterion 30: Finishes

EU Eco-label Criterion

No use is allowed of finishing substances or of finishing preparations containing more than 0,1 % by weight of substances that are assigned or may be assigned at the time of application any of the following risk phrases (or combinations thereof):

R40 (limited evidence of a carcinogenic effect),

R45 (may cause cancer),

R46 (may cause heritable genetic damage),

R49 (may cause cancer by inhalation),

R50 (very toxic to aquatic organisms),

R51 (toxic to aquatic organisms),

R52 (harmful to aquatic organisms),

R53 (may cause long-term adverse effects in the aquatic environment),

R60 (may impair fertility),

R61 (may cause harm to the unborn child),

R62 (possible risk of impaired fertility),

R63 (possible risk of harm to the unborn child),

R68 (possible risk of irreversible effects),

as laid down in Directive 67/548/EEC and its subsequent amendments.

18.5.2002 EN Official Journal of the European Communities L 133/39

Assessment and verification: The applicant shall either provide a declaration that finishes have not been used, or indicate which finishes have been used and provide documentation (such as safety data sheets) and/or declarations indicating that those finishes comply with this criterion.

2009 Criteria Document

New heading: “Fabrics Finishes”

The criterion begins with the new text “The word “finishes” covers all physical or chemical treatments giving to the textile fabrics specific properties such as softness, waterproof, easy care…”

… otherwise as above.

Added:

R-phrases according to new GHS-system.

Criterion 31: Fillings

EU Eco-label Criterion

(a) Filling materials consisting of textile fibres shall comply with the textile fibre criteria (No.s 1 — 9) where appropriate.

(b) Filling materials shall comply with criterion 11 on ‘Biocidal or biostatic products’ and the criterion 26 on ‘Formaldehyde’.

(c) Detergents and other chemicals used for the washing of fillings (down, feathers, natural or synthetic fibres) shall comply with criterion 14 on ‘Auxiliary chemicals’ and criterion 15 on ‘Detergents, fabric softeners and complexing agents’.

	Assessment and verification: As indicated in the corresponding criteria.
Comments	Be aware that b and c refers to earlier criteria.
2009 Criteria Document	No changes.
Example/ Questions/ mini exercise	What would e.g. filling with feathers have to fulfil?

Criterion 32: Coatings, laminates and membranes

EU Eco-label Criterion: **Polyurethane**	(a) Products made of polyurethane shall comply with criterion 3(a) regarding organic tin and criterion 3(b) regarding the emission to air of aromatic diisocyanates. Assessment and verification: As indicated in the corresponding criteria.
Comments	Thus polyurethane has to fulfill the same criteria (criteria 3a and 3b) whether it is used as fibre or as coating/laminate/membrane.
2009 Criteria Document	No changes.
EU Eco-label Criterion: **Polyester**	(b) Products made of polyester shall comply with criterion 8(a) regarding the amount of antimony and criterion 8(b) regarding the emission of VOCs during polymerisation. Assessment and verification: As indicated in the corresponding criteria.
Comments	Thus polyester has to fulfill the same criteria (criteria 8a and 8b) whether it is used as fibre or as coating/laminate/membrane.
2009 Criteria Document	No changes.
EU Eco-label Criterion: **Plasticers and solvents**	(c) Coatings, laminates and membranes shall not be produced using plasticisers or solvents, which are assigned or may be assigned at the time of application any of the following risk phrases (or combinations thereof): R40 (limited evidence of a carcinogenic effect), R45 (may cause cancer), R46 (may cause heritable genetic damage), R49 (may cause cancer by inhalation), R50 (very toxic to aquatic organisms), R51 (toxic to aquatic organisms), R52 (harmful to aquatic organisms), R53 (may cause long-term adverse effects in the aquatic environment), R60 (may impair fertility),

R61 (may cause harm to the unborn child),

R62 (possible risk of impaired fertility),

R63 (possible risk of harm to the unborn child),

R68 (possible risk of irreversible effects),

as laid down in Directive 67/548/EEC and its subsequent amendments.

Assessment and verification: The applicant shall provide a declaration of non-use of such plasticizers or solvents.

2009 Criteria Document

Added:

According to GHS.

Added:

New criterion:

32.4. The VOC emissions to air shall not exceed 10 g C/kg.

Assessment and verification: The applicant shall provide documentation and test reports showing compliance with this criterion, together with a declaration of compliance.

Criterion 33: Energy and water use

EU Eco-label Criterion

The applicant is requested, on a voluntary basis, to provide detailed information on water and energy use for the manufacturing sites involved in spinning, knitting, weaving and wet processing.

Assessment and verification: The applicant is requested to provide, on a voluntary basis, the abovementioned information.

Comments

When these criteria were made it was not allowed to gather information on a not voluntary basis, so that is why it is an option.

2009 Criteria Document

Not voluntary anymore:

The applicant shall provide data on water and energy use for the manufacturing sites involved in wet processing**.**

Assessment and verification: The applicant is requested to provide the abovementioned information.

3.2.3 Fitness for Use

General

The following criteria apply either to the dyed yarn, the final fabric(s), or the final product, with tests carried out as appropriate.

Comments

This means that whether the dying is on the yare, the fabric or the final product, the criteria has to be fulfilled.

2009 Criteria Document

No changes.

Criterion 34: Dimensional changes during washing and drying

EU Eco-label Criterion

Information on dimensional changes (%) shall be stated both on the care label and on the packaging and/or other product information if the dimensional changes exceed:

— 2 % (warp and weft) for curtains and for furniture fabric that is washable and removable,

— 6 % (warp and weft) for other woven products,

— 8 % (length and width) for other knitted products,

— 8 % (length and width) for terry toweling.

This criterion does not apply to:

— fibres or yarn,

— products clearly labelled ‘dry clean only’ or equivalent (insofar as it is normal practice for such products to be so labelled),

— furniture fabrics that are not removable and washable.

Assessment and verification: The applicant shall provide test reports using the following test method: ISO 5077 modified as follows: 3 washes at temperatures as indicated on the product, with tumble drying after each washing cycle unless other drying procedures are indicated on the product, at temperatures as marked on the product, wash load (2 or 4 kg) depending on the wash symbol. Should any of the abovementioned limits be exceeded, a copy of the care-label and of the packaging and/or other product information shall be provided.

Comments

The fitness for use criteria are in general made to secure the quality of the Eco-labelled products.

If the Eco-labelled products did not have a good quality, the customers (consumers and purchasers) would not re-buy Eco-labelled products and they would get a poor reputation.

Also for environmental reasons good quality makes sense, since e.g. a t-shirt that is of poor quality will be waste earlier than a t-shirt of good quality.

2009 Criteria Document

The dimensional changes after washing and drying shall not exceed:

plus or minus 2% for curtains and for furniture fabric that is washable and removable,

more than minus 8% or plus 4% for other woven products and durable non woven, other knitted products or for terry towelling**.**

… otherwise the same.

Example/ Questions/ mini exercise

What dimensional changes limit would a bed linen have to fulfil?

Criterion 35: Colour fastness to washing

EU Eco-label Criterion	The colour fastness to washing shall be at least level 3 to 4 for colour change and at least level 3 to 4 for staining. This criterion does not apply to products clearly labelled 'dry clean only' or equivalent (insofar as it is normal practice for such products to be so labelled), to white products or products that are neither dyed nor printed, or to non-washable furniture fabrics. Assessment and verification: The applicant shall provide test reports using the following test method: ISO 105 C06 (single wash, at temperature as marked on the product, with perborate powder).
2009 Criteria Document	No changes.

Criterion 36: Colour fastness to perspiration (acid, alkaline)

EU Eco-label Criterion	The colour fastness to perspiration (acid and alkaline) shall be at least level 3 to 4 (colour change and staining). A level of 3 is nevertheless allowed when fabrics are both dark coloured (standard depth > 1/1) and made of regenerated wool or more than 20 % silk. This criterion does not apply to white products, to products that are neither dyed nor printed, to furniture fabrics, curtains or similar textiles intended for interior decoration. Assessment and verification: The applicant shall provide test reports using the following test method: ISO 105 E04 (acid and alkaline, comparison with multi-fibre fabric).
2009 Criteria Document	No changes.

Criterion 37: Colour fastness to wet rubbing

EU Eco-label Criterion	The colour fastness to wet rubbing shall be at least level 2 to 3. A level of 2 is nevertheless allowed for indigo dyed denim. This criterion does not apply to white products or products that are neither dyed nor printed. Assessment and verification: The applicant shall provide test reports using the following test method: ISO 105 X12.
2009 Criteria Document	No changes.

Criterion 38 Colour fastness to dry rubbing

EU Eco-label Criterion	The colour fastness to dry rubbing shall be at least level 4. A level of 3 to 4 is nevertheless allowed for indigo dyed denim. This criterion does not apply to white products or products that are neither dyed nor printed, or to curtains or similar textiles intended for interior decoration.

Assessment and verification: The applicant shall provide test reports using the following test method: ISO 105 X12.

2009 Criteria Document

No changes.

Criterion 39: Colour fastness to light

EU Eco-label Criterion

For fabrics intended for furniture, curtains or drapes, the colour fastness to light shall be at least level 5. For all other products the colour fastness to light shall be at least level 4.

A level of 4 is nevertheless allowed when fabrics intended for furniture, curtains or drapes are both light coloured (standard depth < 1/12) and made of more than 20 % wool or other keratin fibres, or more than 20 % silk, or more than 20 % linen or other bast fibres.

This requirement does not apply to mattress ticking, mattress protection or underwear.

Assessment and verification: The applicant shall provide test reports using the following test method: ISO 105 B02.

2009 Criteria Document

No changes.

3.2.4 Information on eco-label

Criterion 40

Information appearing on the eco-label

Box 2 of the eco-label shall contain the following text:

- reduced water pollution
- hazardous substances restricted
- whole production chain covered

Assessment and verification: The applicant shall provide a sample of the product packaging showing the label, together with a declaration of compliance with this criterion.

Comments

This criterion is made to spread knowledge about what the eco-label do for the environment, but also to combine the Flower logo with certain environmental aspects.

2009 Criteria Document

- Encouraging the use of sustainable fibres (NEW)

- Durable and high quality (NEW)

- Hazardous substances restricted (AS BEFORE)

3.3 Making an Application

3.3.1 Exercise 1: Tasteful Textiles want to sell bed linen with the Flower

Purpose of the exercise

The participants will in practice find out how to make an application. Which criteria are relevant for the product type? Which company must document the criteria – and how?

Introduction to the exercise

The German textile company "Tasteful Textiles" want to label their bed linen with the Flower. They sell 70% of their products in Germany; the last 30% is sold in Austria and Belgium.

Tasteful Textiles colour the fabric them selves. They colour the fabrics blue, yellow or green with the dyes "Blue Color 1", "Yellow Color 3" and "Green Brilliant Color 5" and the helping substance formic acid. The dyes are not azo dyes, metal complex dyes or chrome mordant dyes.

After the colouring the fabric is treated with "Super Soft XL 19" to soften the fabric. This makes the fabric feel nicer (for the buyer when the linen is sold) but it also has a technical function; the needle passes through the fabric easier and without damaging the threat when sewn.

When Tasteful Textiles have coloured the fabrics they are sent to the polish company "Super Sew", where the bed linen are sewn from the fabric; each pillow case weight 100 grams and each duvet cover weight 700 grams. Buttons and buttonholes are also sewn at the bed linen; the pillow cases get 2 buttons and the duvet covers get 4 buttons. The buttons are made of tree and weight 5 grams each.

Tasteful Textiles buy the fabric from the Swiss weaving company "Fantastic Fabrics". The fabric is made of 93% cotton, 2% elastane and 5% polyester. Fantastic Fabrics use the size "Fantastic Size 292".

Tasteful Textiles does not know where Fantastic Fabrics buy their raw materials.

Questions

1. Can the product be Eco-labelled? Why / why not?
2. To which competent body must the application be sent?
3. Which company must document which criteria? (criteria nos.)
4. How must the relevant criteria be documented? (include the page numbers as given in the user manual and what should be attached with the various declarations)
5. Are there ways to make some of the documentation easier? E.g. by changing something in the way the fabric is composed?
6. What kind of marketing could they do to promote their products with the Flower?

For guidance – not only for this exercise but also for real applications – some general tasks and considerations are filled in below, called "Task 1-3".

Task 1

Start by drawing a flow chart of this production.

Task 2

Research of the suppliers:

First question: Does the supplier already have a Flower license?
If Yes: Ask the supplier to send their licence number and a letter stating that the production for the relevant products is covered by the license. Fill in the relevant application forms from the user manual.
If no: Next question: Has the supplier previously provided flower documentation for another customer?
If yes: Ask the supplier to send the same documentation relevant for this production.
If no: proceed to task 3

Space for participants notes:

Next question: Where does the supplier come from?
If European: Proceed to step c.
If Asian or other: Start by finding out if they treat their waste water.
If yes: Send them the relevant declarations from the user manual – it can make sense to start with the declarations for waste water to see if they conform to the waste water criteria. Continue to step c.
If no: Stop the work with this supplier.

Space for participants notes:

Task 3

Assistance towards application:

Sort out which declarations from the user manual which supplier has to fill in and what they need to attach - and send it to the supplier. If you send the whole user manual it can be very overwhelming to somebody who is not use to work with it. Find out whether to contact them directly or whether an agent or any other supplier will do it.

Space for participant notes:

Make sure that all wet processes are covered with treatment.
If a supplier is not responding, try to find out the reason. It could be because they don't understand what is required of them or they don't want to pay for the test, but it only possible to solve if you know what the problem is.

Space for participant notes:

Make a folder with an index. Place the received documentation under the relevant index and check that all the needed information and documentation are received, and that the declarations are filled in correctly with date, ticked boxes, stamp and signature.

Space for participant notes:

When all documentation is received, send your product for the fitness for use tests. If you are in a hurry that can of course be done earlier in the process, but this way you don't use money on it in case some for your suppliers don't fulfil the criteria.

Space for participant notes:

Fill in the application forms and send it all to the relevant competent body.

Answer to Question 1

Answer to Question 2

Answer to Question 3

Answer to Question 4

Answer to Question 5

Answer to Question 6

3.3.2 Exercise 2: Expansion of the Flower licence

Purpose of the exercise

The participants will in practice find out how to make an application. What is allowed? Which criteria are relevant for the product type? Which company must document the criteria – and how?

Presentation

Tasteful Textiles have had much success selling Flower labelled blue, yellow and green bed linen, so one year after they have got their Flower license they want to expand their Flower assortment.

They what to produce red and black bed linen as well (using “Perfect Red 7” and “Deep Black 9”), and they want to send the coloured bed linen to a printing company “Perfect Print” (placed in Denmark) where the bed linen will get a beautiful flower printed at the middle (using the printing pigments “Flower Green Q” and “Flower Blue T”).

Tasteful Textiles also want to expand their market to also include United Kingdom. This means that the bed linen must be treated so fire in beds does not easily take place (UK legislation).

Questions

1. Is it possible to expand the licence?
2. If so, which company must document which criteria – and how?

Use the guidance from exercise 1 (some general tasks and considerations are filled in below, called “Task 1-3”).

Work in groups

Answer the questions – use the check list under the questions to guide you.

Presentation of the answers

One question at the time and ask in plenum for their solutions. If time let different people from different groups present their answer.

Your notes

Answer to Question 1

Answer to Question 2

3.4 Legislation Relevant for Textiles

3.4.1 Introduction

Main regulation

The main regulations relevant for textiles are:

- REACH
- Azo dyes
- Nickel

But also of interest for textile are:

- Phthalates
- Cadmium
- Safety of toys
- Certain flame retardants
- Disinfection and preservation chemicals
- PCP Pentachlorophenols, its salts and esters
- PFOS based products
- APEO based products
- Heavy metals
- Organic production (relevant for new criteria document)

3.4.2 REACH

Definition of an "article" according to REACH

According to Article 3 in the REACH-Regulation point 3 the definition of an article is
"*article: means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition*"

General

Obligations for article producers

The points hereunder shortly describe the essence of what obligations article producers have under the REACH regulation. As article producer you have to refer to the full REACH text e.g. article 5 if you manufacture substances, but in the text below *article 7* and *article 33* are the primary focus. Also the short guidance on articles (to be found at http://guidance.echa.europa.eu/docs/guidance_document/nutshell_guidance_articles2.pdf) is relevant.

Registration

Registration is the submission to ECHA of a technical dossier with information on the properties of a substance and, if required, a chemical safety report documenting the chemical safety assessment for this substance. Registration of a substance in articles is mandatory for an **article producer or importer** only if the following two conditions are met:

- The substance is intended to be released from the produced and/or imported articles during normal or reasonable foreseeable conditions of use.
- The total amount of the substance present in all articles produced and/or imported, from which the substance is intended to be released, exceeds 1 tonne per year.

For the second condition the amounts intended to be released as well as the amounts which are not (intended) to be released need to be taken into account. Furthermore, if different types of article with intended release are produced and/or imported, the quantities in all articles with intended release have to be summed up.

If the above conditions are not met, ECHA may still decide that an article producer or importer must submit a registration for any substance in an article, if the amount of the substance exceeds 1 tonne per year and there is a suspicion that the substance is released from the article resulting in risk to human health or the environment.

In any case, the substance does not have to be registered by the article producer or importer, if this substance has already been registered for that use (i.e. the use by which the substance is included in the article) by another company.

Notification

Notification is the submission of specific information on a substance and its uses in articles to ECHA. Notification of a substance in articles is required by an **article producer or importer** when all of the following conditions are met:

- The substance is included in the candidate list of substances for authorization (see section 2).
- The substance is present in articles produced and/or imported above a concentration of 0.1% (w/w).
- The total amount of the substance present in all articles produced and/or imported, which contain more than 0.1% (w/w) of the substance, exceeds 1 tonne per year.

If, however, any of the following conditions are met, no notification is required:

- The producer/importer can exclude exposure of the substances to humans or the environment during normal or reasonably foreseeable conditions of use including disposal (i.e. it can be demonstrated that no exposure occurs at all life-cycle stages of the substance).
- The substance has already been registered for that use (i.e. the use by which the substance is included in the article) by another company.
- The articles have only been produced and/or imported by the producer/importer before the substance was included in the candidate list of substances for authorization.

The substance concentration threshold of 0.1% (w/w) applies to the article as produced or imported. It does not relate to the homogeneous materials or parts of an article, as it may in some other legislation, but relates to the article as such (i.e. as produced or imported).

A notification of substances in articles shall be made at the latest 6 months after it has been included on the candidate list of substances for authorization, but only starting from 1 June 2011.

Communication of Information on Substances in Articles

Suppliers of articles containing a substance included in the candidate list of substances for authorization in a concentration above 0.1% (w/w) have to provide relevant safety information about this substance available to them to the recipients of these articles. If no particular information is necessary to allow safe use of the article containing a substance from the candidate list, as a minimum the name of the substance in question has to be communicated to the recipients. The information is to be provided to the recipients automatically, i.e. directly after the substance is included in the candidate list. Note that the term “recipients” refers to **industrial or professional users and distributors**, but not to consumers.
Information available to the article supplier necessary to ensure safe use of an article has to be provided also to **consumers** upon request. Consumers have to be provided with this information within 45 days of the request, free of charge.
As concerns the obligation to communicate information on substances in articles in general (i.e. communication with recipients and consumers), please note that:

- There is no tonnage trigger for this obligation (i.e. it also applies below 1

tonne per year).

- A packaging is always to be treated as an article separate from the contents of the packaging. Therefore, the obligation to communicate information on substances in articles also applies to packaging materials.
- The substance concentration threshold of 0.1% (w/w) applies to the article as supplied. Like in the context of substance notification, it does not relate to the homogeneous materials or parts of an article, but to the article as such3.
- The obligation also applies to articles which were produced or imported before the substance was included in the candidate list and are supplied after the inclusion. Thus, the date of supply of the article is the relevant date here.

Substances of Very High Concern

A list over the substances of very high concern (SVHC) is to be found in Annex XIV or at the candidate listed to Annex XIV. Annex XIV are not publicized together with the REACH legislation but are to be found at ECHAs website: http://echa.europa.eu. The following categories of substances are candidates for Annex XIV (see article 57):

- CMR, category 1 & 2 (carcinogenic, mutagenic, reproduction toxic)
- PBT, substances (persistent, bioaccumulative and toxic), vPvB (very persistent, very bioaccumulative)
- endocrine disrupting properties and substances having similar effects as the CMR- and PBT-substances

Right now the candidate list contains the following substances (Substance name, CAS number):

- Triethyl arsenate 427-700-2
- Anthracene 204-371-1
- 4,4'- Diaminodiphenylmethane (MDA) 202-974-4
- Dibutyl phthalate (DBP) 201-557-4
- Cobalt dichloride 231-589-4
- Diarsenic pentaoxide 215-116-9
- Diarsenic trioxide 215-481-4
- Sodium dichromate 234-190-3
- 5-tert-butyl-2,4,6-trinitro-m-xylene (musk xylene) 201-329-4
- Bis (2-ethylhexyl)phthalate (DEHP) 204-211-0
- Hexabromocyclododecane (HBCDD) and all major diastereoisomers identified 247-148-4 and 221-695-9:
    - Alpha-hexabromocyclododecane (134237-50-6)
    - Beta-hexabromocyclododecane (134237-51-7)
    - Gamma-hexabromocyclododecane (134237-52-8)
- Alkanes, C10-13, chloro (Short Chain Chlorinated Paraffins) 287-476-5
- Bis(tributyltin)oxide (TBTO) 200-268-0
- Lead hydrogen arsenate 232-064-2
- Benzyl butyl phthalate (BBP) 201-622-7

Overview

The following table compares the registration, notification and communication obligations for substances in articles.

Obligation:	*Registration of substances in articles*	*Notification of substances in articles*	*Communication of information on substances in articles*
legal basis in REACH Regulation	Article 7(1)	Article 7(2)	Article 33
actors concerned	article producers and article importers	article producers and article importers	article suppliers
substances concerned	substances intended to be released from articles	substances included in candidate list of substances for authorisation	substances included in candidate list of substances for authorisation
tonnage threshold	1 tonne per year	1 tonne per year	-
concentration in article threshold	-	0.1% (w/w)	0.1% (w/w)
exemption from obligation possible on the basis of:			
substance already registered for that use	yes	yes	no
exposure can be excluded	no	yes	no

Table 1: Main obligations for substances in articles.

3.4.3 Other Main Regulation Relevant for Textiles

Azo dyes

The Directive restricts the marketing and use of certain dangerous substances and preparations (azo colourants). Azodyes which, by reductive cleavage of one or more azo groups, may release one or more of the aromatic amines listed in the appendix in concentrations above 30 ppm in the finished articles or in the dyed parts thereof, may not be used in textile and leather articles which may come into direct and prolonged contact with the human skin or oral cavity, such as

- clothing, bedding, towels, hairpieces, wigs, hats, nappies and other sanitary items, sleeping bags,
- footwear, gloves, wristwatch straps, handbags, purses/wallets, briefcases, chair covers, purses worn round the neck
- textile or leather toys and toys which include textile or leather garments,
- yarn and fabrics intended for use by the final consumer.

Textile and leather articles may not be placed on the market unless they conform to the requirements set out.

The 22 aromatic amines are listed below, together with a specific banned “blue colourant”.

'Point 43 — Azocolourants

List of aromatic amines

	CAS number	Index number	EC number	Substances
1	92-67-1	612-072-00-6	202-177-1	biphenyl-4-ylamine 4-aminobiphenyl xenylamine
2	92-87-5	612-042-00-2	202-199-1	benzidine
3	95-69-2		202-441-6	4-chloro-o-toluidine
4	91-59-8	612-022-00-3	202-080-4	2-naphthylamine
5	97-56-3	611-006-00-3	202-591-2	o-aminoazotoluene 4-amino-2',3-dimethylazobenzene 4-o-tolylazo-o-toluidine
6	99-55-8		202-765-8	5-nitro-o-toluidine
7	106-47-8	612-137-00-9	203-401-0	4-chloroaniline
8	615-05-4		210-406-1	4-methoxy-m-phenylenediamine
9	101-77-9	612-051-00-1	202-974-4	4,4'-methylenedianiline 4,4'-diaminodiphenylmethane
10	91-94-1	612-068-00-4	202-109-0	3,3'-dichlorobenzidine 3,3'-dichlorobiphenyl-4,4'-ylenedia-mine
11	119-90-4	612-036-00-X	204-355-4	3,3'-dimethoxybenzidine o-dianisi-dine
12	119-93-7	612-041-00-7	204-358-0	3,3'-dimethylbenzidine 4,4'-bi-o-toluidine
13	838-88-0	612-085-00-7	212-658-8	4,4'-methylenedi-o-toluidine
14	120-71-8		204-419-1	6-methoxy-m-toluidine p-cresidine
15	101-14-4	612-078-00-9	202-918-9	4,4'-methylene-bis-(2-chloro-aniline) 2,2'-dichloro-4,4'-methylene-dianiline
16	101-80-4		202-977-0	4,4'-oxydianiline
17	139-65-1		205-370-9	4,4'-thiodianiline
18	95-53-4	612-091-00-X	202-429-0	o-toluidine 2-aminotoluene
19	95-80-7	612-099-00-3	202-453-1	4-methyl-m-phenylenediamine
20	137-17-7		205-282-0	2,4,5-trimethylaniline
21	90-04-0	612-035-00-4	201-963-1	o-anisidine 2-methoxyaniline
22	60-09-3	611-008-00-4	200-453-6	4-amino azobenzene'

The full text of Directive 2002/61/EC of the European Parliament and of the Council of 19 July 2002 on restrictions on the marketing and use of certain dangerous

substances and preparations (azo colourants) can be found in the Official Journal of the European Communities No. L243, 11.9.2002, p. 15-18.

Amendments were published in the Commission Directive 2003/3/EC of 6 January 2003 (OJ No. L4, 9.1.2003, p. 12–15) (adding 'blue colourant') and Commission Directive 2004/21/EC of 24 February 2004 (OJ No. L57, 25.2.2004, p. 4-5) (adding test methods).

Nickel from metal accessories in clothing and textiles

Nickel may not be used in products intended to come into direct and prolonged contact with the skin, e.g. rivet buttons, tighteners, rivets, zippers and metal marks, if the rate of nickel release from the parts of these products coming into contact with the skin is greater than 0.5 µg/cm2/week.

The full text of Directive 94/27/EC of the European Parliament and of the Council of 30 June 1994 on restrictions on the marketing and use of certain dangerous substances and preparations can be found in the Official Journal of the European Communities No. L188, 22.07.1994, p. 1-2.

3.4.4 Other Regulation Relevant for Textiles

Phthalates from Products for Children

"Any product intended to facilitate sleep, relaxation, hygiene, the feeding of children or sucking on the part of children" – should not contain a number of phthalates at concentrates of greater than 0.1% by mass of plasticised materials in toys and child care articles.

The restricted phthalates are:

- bis (2-ethylhexyl) phthalate (DEHP), CAS No. 117-81-7
- dibutyl phthalate (DBP), CAS No. 84-74-2
- benzyl butyl phthalate (BBP), CAS No. 85-68-7
- di-"isononyl" phthalate (DINP), CAS No. 28553-12-0 and 68515-48-0
- di-"isodecyl" phthalate (DIDP), CAS No. 26761-40-0 and 68515-49-1
- di-n-octyl phthalate (DNOP), CAS No. 117-84-0.

The full text of Directive 2005/84/EC of the European Parliament and of the Council of 14 December 2005 on restrictions on the marketing and use of certain dangerous substances and preparations (phthalates in toys and childcare articles) can be found in the Official Journal of the European Communities No. L344, 27.12.2005, p. 40-43.

Cadmium

Products and components of products manufactured from a number of substances and preparations coloured or stabilised with cadmium may not be placed on the market if their cadmium content (expressed as Cd metal) exceeds 0.01% by mass.

The full text of the Council Directive 91/338/EEC of 18 June 1991 on restrictions on the marketing and use of certain dangerous substances and preparations can be found in the Official Journal of the European Communities No. L186, 12.07.1991, p. 59-63.

Safety of Toys

In the Directive for safety of toys there are some restrictions on the migration of some heavy metals from toys. In toy articles for children below 14 years bioavailability resulting from the use of toys must not exceed the following levels per day:

- 0.2 µg for antimony (Sb)
- 0.1 µg for arsenic (As)
- 25.0 µg for barium (Ba)
- 0.6 µg for cadmium (Cd)
- 0.3 µg for chromium (Cr)

- 0.7 µg for lead (Pb)
- 0.5 µg for mercury (Hg)
- 5.0 µg for selenium (Se).

The full text of Directive 88/378/EEC of the Council of 3 May 1988 concerning the safety of toys can be found in the Official Journal of the European Communities No. L187, 16.07.1988, p. 1-13.

Certain Flame Retardants

The following three flame retardants may not be used in textile products which come into contact with the skin:

- tris (2,3 dibromopropyl)-phosphate **(TRIS)**, CAS No. 126-72-7
- tris-(aziridinyl)-phospinoxide **(TEPA),** CAS No. 5455-55-1
- polybrominated biphenyls **(PBB)**, CAS No. 59536-65-1.

The full text of Directive 79/663/EEC of the Council of 24 July 1979 and of Council Directive 83/264/EEC of 16 May 1983 on restrictions on the marketing and use of certain dangerous substances and preparations can be found in the Official Journal of the European Communities No. L197, 03.08.1979, p. 37 – 38 and L147, 06.06.1983, p. 9-10.

Disinfection and preservation chemicals

Disinfection and preservation chemicals may not be used for textile clothing articles which come into contact with provisions.

Provisions means foodstuff, food articles, food.

PCP Pentachlorophenols, its salts and esters

Products containing more than 0.1% (= 1000 mg/kg) PCP or salts or esters of PCP are not allowed for clothing, only for impregnation of fibres or heavy duty textiles not intended in any case for clothing or decorative furnishings.

The full text of Commission Directive 1999/51/EC of 26 May 1999 can be found in the Official Journal OJ L142, 5.6.1999, p. 22–25.

PFOS based products

Perfluoroctanesulfonates (PFOS) with the brutto formula C8F17SO2X

(X = OH, metal salt (O-M+), halogenide, amide and other derivatives, including polymers) are not allowed in textiles or other materials with coatings, if the amount of PFOS is 1 µg/m2 or more of the coated material.

Please see the full text of Directive 2006/122/EC of the European Parliament and of the Council of 12 December 2006 amending for the 30th time Council Directive 76/769/EEC on the approximation of the laws, regulations and administrative provisions of the Member States relating to restrictions on the marketing and use of certain dangerous substances and preparations (perfluorooctane sulfonates) (Text with EEA relevance)

APEO based products

Nonylphenol or nonylphenol ethoxylate may not be placed on the market or used as a substance or constituent of preparations in concentrations equal to or higher than 0.1% by mass for textile and leather processing.

These chemicals can be used in textile detergent and dispersing agents, e.g. in connection with pigment printing. This means that in some cases these substances may be detected in the final product.

The full text of Directive 2003/53/EEC of the European Parliament and of the Council of 18 June 2003 on restrictions on the marketing and use of certain dangerous substances and preparations can be found in the Official Journal of the European Communities No. L178, 17.7.2003, p. 24–27.

Heavy metals Content of heavy metals like arsenic, mercury, lead compounds and cadmium are banned or regulated in many products, e.g. paints and lacquers etc.

Organic production (relevant for new criteria document) Normally you just ask for the certification of the cotton, so it is not necessary to know everything about the criteria for organic production. But if you want to know more please see the links at the reading list (chapter 10.2)

Regulation (EEC) No 834/2007

3.5 Finding Potential Applicants

Procedure

1. Research
2. Identification
3. Preparation
4. Contact

How to target the companies to approach - Research and identification

a. Customer
If their customers want environmental reputation

b. Public procurement
Price/Quality/Environment (Env.last 5 years: 2% now 8%)
Working clothes in DK: Bl: Automatic full score, only documentation=license

c. Children
Often parents are concerned for their children, so companies producing products for children are relevant

d. Environmental image
If the company want an environmental image – look at EMAS- and ISO 14000-companies

e. Front runners
Often if a company are front runner at another area (e.g. social) it is more prepared to be environmental changeable too.

When the potential applicants are identified (as above) prepare the arguments relevant for this company – think about

A. Environmental arguments

B. Sales arguments
- Public procurement
- Environmental image
- Free marketing from the Flower website when have license
- Etc

C. Good feeling – doing the right thing

D. Support provided
- Helping understanding the criteria
- Explain the use of the user manual / application pack
- Marketing material / ideas from the Flower website

Making contact to a chosen company:

Start by calling, if possible set up a meeting. It is always better to talk in person than it is per phone, but if a meeting is not possible the argumentations will just have to be done per phone (then chose to think about that that will save you time that you can use to actual help the applicant instead).

Marketing Material

At the EU Eco-label Webpage there are a little marketing material, which can be used for free (just need to print(if interested – or it can be used as inspiration: http://ec.europa.eu/environment/Eco-label/index_en.htm – under marketing (and the first 2 also under textiles)

3.6 Success Stories

Gregory Knitting Mills in South Africa

There was a license I Denmark from South Africa.

The first company outside Europe the Danish Competent Body visited was Gregory Knitting Mills in South Africa. They had participated in a cleaner technology project supported by DANCED (Danish Cooperation for Environment and Development). The company decided to apply for the EU-Flower in order in prove that they were able to produce textile in a less harmful way. At the time of the visit (2002) the company did not have any direct export to Europe but they hoped that the EU-Flower could help them find costumers in Europe, but so far they have not sold anything with the Flower in Europe. Was Gregory Knitting Mills a success or a failure? That depends of how you want to measure. From a consumers point of view it had been a failure due to lack of Eco-labelled products from them at the European market, but on the other hand Gregory Knitting Mills were very proud that they could fulfill the requirements in the EU-Flower and it can have influenced the environment and the employees' pride of their company.

India

The Danish Competent Body has visited and audited companies in Egypt, South Africa, India, Malaysia and Indonesia. Besides these companies Eco-labelling Denmark has also licence holders in China and Thailand.

In 2008 4 applicants was visited in India. At Eco-labelling Denmark they were quite skeptical before the trip to what kind of companies it would be, what standards they would have, but it turned out to be very impressive. They were all very modern and the production was computer controlled. Most of them were able to reuse almost 90 % of their waste water into the production minimizing the environmental impact of the waste water.

Thailand

Thailand becomes the first country in Asia (July 2007) and the world, whose silk and textile products have attained the "Flower Logo", the official eco-label of the European Union (EU).

The four Thai manufacturers include Greenville Trading Company Limited, Rama Textile Industry, Thong Thai Textile Co., Ltd. and Asia Fiber Public Co., Ltd.

According to the Head of Delegation of the European Commission to Thailand, Ambassador Friedrich Hamburger, the success of the Thai companies in attaining the "Flower Logo" will help the Thai silk and textile industry emerge as a standard and best practice leader for Asia.

The initiative is an excellent example of today's co-operation between the EU and Thailand--pragmatic projects with very real benefits for those who participate, the Ambassador said.

The EU “Flower Logo” environmental mark certifies that Thai silk and textile products are environmentally-friendly from designs, production and marketing processes and even use and services of the products.

Thai silk and textile companies obtaining the logo as part of an EU-funded initiative must have proved that there is very limited release into water supply of chlorine-based substances, as well as metals or dyes dangerous to health and the environment.

Greenville Trading Company Limited was announced the world’s first silk company awarded the “Flower Logo” in May 2007, while Rama Textile Industry and Thong Thai Textile Co., Ltd. gained the logo for cotton yarn and cotton cloth in March 2007 making them become the first textiles companies to obtain the eco-label in Asia and Asia Fiber Public Co., Ltd. was awarded the logo in April 2007.

The EU-funded initiative was launched to help the Thai textile industry get to grips with EU rules and standards necessary to attain the “Flower Logo”.

Through partnership among the National Metal and Material Technology Centre (MTEC), Thailand Textile Institute (THTI), Kasetsart University (KU) and the Danish Technological Institute, the four Thai silk and textile companies took part in a pilot phase of the project.

The EU is Thailand’s second largest textile market, importing Thai textiles worth some 40 billion baht annually.

http://thailand.prd.go.th/view_focus.php?id=2144

According to a conversation with Rama Textile Industry, the most difficult part of the application was to fulfill criteria 10-33, since they apply to all processes of the production. Their economic and environmental successes are fixation of dyestuff of over 80%, use of recycled water in the dying process (saves also cost of treatment of water), saving energy, water, steam and electricity. Getting the flower made their customers trust of the quality of their products even more, which had an influence on their reputation. Also important was the general issue of producing quality products in an environmentally friendly way, which also was safe for the workers, had a positive influence on the way the company is perceived.

Malaysia and Indonesia

The picture was almost the same in Malaysia and Indonesia. Both companies were very modern and had high standard in both production and waste water treatment.

4 Module B2 Footwear

4.1 Introduction

4.1.1 About this Module

Learning Objectives

Participants will:

- Have mastery of Eco-label criteria for Footwear and at the same time the knowledge of the assessing test methods required
- Learn the correct way to prepare an application form in order to achieve the Eco-label
- Be able to control and verify the characteristic of the raw materials, the models and the aspects correlated to the life cycle of footwear

Programme

- Introduction
- Eco-label criteria
- Discussion on criteria
- Legislation
- The new revision of criteria
- Application of Eco-label for footwear
- Final discussion on application

4.1.2 The EU-Eco-label

Introduction

The project is part of the specific plan for environment released by the European Community.

Many kinds of materials for large distribution have been included in the possibility to grant the Eco-label.

It is not possible to have the Eco-label for raw materials but only for final products because it is intended for final user as instrument to increase the sensibility of final user itself in the view of respect on environment

Reasons Behind the EU Eco-label

The Eco-label system, based on prescription of ad hoc regulation of the European Community, represents a relevant point on action plan for environmental defence launched by the European community itself.

A large part of people in Europe and over the world has reach conscience on fact that natural resources and the environment are goods really precious which have to be preserved, in order to have a sustainable development, able to maintain the state of environment.

To reach this target everybody must assume more sense of responsibility on style of life and moreover finding innovative manner to improve the quality of the environment taking into account the possibility to get better at the same time the economic growth

What the EU Eco-label Represents

The Eco-label represents one of the possible ways, certainly innovative, which offer a valid tool for producer and consumer with the aim to promote a sustainable development and at the same time to have a responsible use of environmental friendly goods.

It is clear that the Eco-label is a condition of excellence on the market because the certification is a strong voluntary choice for a firm because the Eco-label certification is not only a label; it is a new industrial approach.

For producers it means a new concept of industrial approach directly linked to the respect of environment on industrial point of view;

It also means a new approach on evaluation on suppliers of raw materials because they are considered under a point of view of their interest on environment.

4.2 EU Eco-Label Website and Key References

Key references

Reg. 1980/2000/CE Regulation of the European Parliament and of the Council on a revised Community eco-label award scheme

COMMISSION DECISION of 18 March 2002 establishing revised ecological criteria for the award of the Community eco-label to footwear and amending Decision 1999/179/EC 2002/231/EC

COMMISSION DECISION of 9 July 2009 on establishing the ecological criteria for the award of the Community eco-label for footwear 2009/563/EC

Copies of the two Decisions on criteria for footwear are included in the Module B2 Resource Materials (Resources 1 and 2).

The EU Eco-label Website

At the website http://ec.europa.eu/environment/ecolabel/index_en.htm.

It is possible to find all documents able to give information regarding the Eco-label and in particular:

- Criteria documents
- User Manuals
- Competent Bodies in the State members
- News
- Links – e.g. to other eco-labels

A copy of the User Manual for footwear is included in the Module B2 Resource materials (Resource 3).

4.3 Development of Eco-label Criteria for Footwear

First Criteria in 1999

The history of the criteria for footwear began in 1992 with the first study made under the supervision of the Stiching Milieukeur which is the Nederland Competent Body.

The discussion took place for a long time until the European Commission gave mandate to CEC and CEN/TC 309 to decide the list of criteria in order to send the Commission for approval. The first criteria for Eco-label for footwear was approved and published in 1999 with the reference 179/99/CE

Role of CEC and CEN/TC

CEC is the European Federation of footwear manufacturing.

CEN/TC 309 is the technical group in charge to study the information of test

methods and characteristic of footwear and footwear materials. It is divided in three groups which are:

- WG1 in charge to study test method and characteristics with regard to general aspects
- WG2 is involved, in a first time, to study the environmental aspects related to footwear industry. Now, it include also the study of the chemical tests related to footwear and footwear materials, giving support to test methods also for assessing criteria for Eco-label.

One of the normative edited by WG 2 is the EN 14602 – Footwear – Test method for assessment of ecological criteria which include a guideline

For ecological production of footwear and the evolution of the test methods included in the Decision of The Commission 2002/231/CE related to criteria for footwear

WG3 is intended to study terms and definition in footwear industry

Study of Environmental Impact of Footwear

CEN/TC 309 WG 2, involved in study of environmental impact of footwear industry, it has strictly cooperated with the European Commission to reach a list of criteria in 1999 and, later for assessing the revision in 2002 with the supervision of AENOR, normalisation body of Spain

CEN/TC 309 WG2 was involved in strict cooperation in any steps regarding the criteria for footwear in any edition of the criteria

The 2002 Decision on Criteria

The criteria fixed with the Decision of the Commission 2002/231/CE are already expired and the validity was fixed until March 2010 when the new criteria will be approved by the Commission.

New criteria was studied by LCE Life Cycle Engineering which is the consultant office in charge to coordinate the study of the new criteria

In any case, a “transitional period should be allowed for producers whose products have been awarded the eco-label for footwear based on the criteria contained in Decision 2002/231/EC, so that they have sufficient time to adapt their products to comply with the revised criteria and requirements. Producers should also be allowed to submit applications set out under the criteria set in Decision 2002/231/EC or set out under the criteria set in this Decision until the lapse of validity of that Decision.”

The validity is still reported in the Commission Decision 2008/63/CE until 31 March 2010

2009 Decision on Criteria

As reported in the Official Journal of the European Union L 196/27 of the 28.07.2009, there is a new COMMISSION DECISION number 2009/563/CE approved on July the 9th 2009 on establishing the ecological criteria for the award of the Community Eco-label for footwear.

4.3.1 The EU Eco-label Application Process

The Product Group

Choosing to follow the Eco-label is an important choose for the firm because is a new industrial approach which involve a complete range of aspects. The internal choose regard the conviction of the organisation to make something which can have a positive impact for environment. The external choose involve all the suppliers to have particular regard to the environment aspect in manufacturing the raw materials. There a direct link between the parts in advantage of the final product and the environmental impact.

The Basic Steps to get the EU Eco-label

The principal steps to reach the Eco-label go through the following ones:

- Choosing of the line of models;
- Choosing materials
- Respect of the rules for the materials used
- Testing materials (from licensed laboratory)
- Sending application and technical documentation
- Inquiry by Competent Body
- Acceptance of documentation
- Licence to use the Eco-label

Choosing the Line of Models

A line of models to which apply the Eco-label could be identified in a homogeneous characteristic style or styling of the footwear.

Footwear is a typical article which follows a seasonable characteristic of marketing. This characteristic could be chosen for determining the “line of model” for applying Eco-label.

This choice is not mandatory. It needs only to fix a way to give a name based on one or more characteristic of the footwear.

The winter / fall collection or spring / summer collections are two examples. Other possibility is a children collection and so on.

For professional footwear the choice is more restricted by the fact that for the European Standard which determine the characteristic

For professional footwear describe the sole design as important way to define footwear with similar characteristic

Choosing Materials

The criteria for Eco-label fix some characteristic which any material used in footwear have to respect.

Moreover any materials chosen must comply with the rules fixed by law regarding dangerous substances which are as residual in the materials itself.

The respect of the law is independent of Eco-label and have always to be assessed

EU Laws

All the materials making part of the footwear with Eco-label flower must always comply with the rules in all countries the footwear will be distributed.

In Europe this rules are mainly restricted, for the whole Europe, in the following items:

Leather and textile: Azo dyes as indicated in the European Directive 2002/61/CE. Some aril amine must be detected in quantity, each one, not over 30 mg/kg. This is the limit of detection of the methods used for determining the presence of these amines. It involve some azo dyes must not to be used

Plastic material: cadmium as indicated in the European Directive 93/338/CE which imposes a limit of 0.01% by weight in plastic materials. This is very important mainly for Polyvinylchloride polymers but also for others plastics material. 0.01% by weight is the correspondent of 100 mg/kg and the test method for determining cadmium in plastic materials is the EN 1122.

Nickel in the metallic materials in long and direct contact with the user must be absent or released in an amount less than 0.5 µg/cm^2/week and the method to determine the release is the EN 1811.

Others law can be requested in particular country. Moreover the European Legislation is moving toward the goal to obtain a more safe products present in

the market and the state of the art is going up.

All these directives from first of June 2009 expired and the content was inserted, without variation, in the Annex XVII of the Regulation 1907/2006/CE also knew as R.e.a.c.h.

REACH

The R.e.a.c.h. means Registration, evaluation, authorisation of chemicals is the rule which manages the industries producing and using chemicals to stay at some rule in using chemicals. It has particular importance for producer or importer of chemicals in the European Community.

For the footwear industries, the R.e.a.c.h. involves a particular attention to maintain an exchange of information between the actors of the production chain in order to keep under control some substances which are regulated or under evaluation.

The Candidate List

The candidate list is a list of chemicals which are potentially dangerous and object of evaluation for use. Even not yet restricted, is mandatory to give information to the customer when in the articles there is more than 0.1% by weight of one or more of these substances.

The same information shall come from the suppliers because are information which follow automatically the life of any chemicals or articles.

The declaration is mandatory and must be real. Suppliers from outside the European Community don't have any rules regarding R.e.a.c.h.

With the information of the presence of some substances included in the Candidate List, it is mandatory give also information of safety directly linked with the use of these substances. In ex. For the three phthalates included in the Candidate List, at least it will be necessary to communicate that the possible migration of these chemicals could happen when in contact with the mouth

Definition of Article

An object which during production is given a special shape, surface or design which determines its function to a greater degree than does it chemical composition.

All the final products are article but also some raw materials are to be considered articles.

For footwear industry, shoes have to be considered articles also all the raw materials used in footwear manufacturing.

Further Information

This is the home page of E.C.H.A. is http://echa.europa.eu/ where is possible to find any information regarding R.e.a.c.h.

Technical Documentation

Second step in the fulfilling the notice for Eco-label, is the technical file. This technical file will include all the notice regarding materials, characteristic of the materials, the system of manufacturing and all the notice which have significance for the production.

It will also include the test report with the results of the tests carried out for assessing the respect of the criteria when requested. These results shall be from a laboratory with specific characteristic fixed by the Competent Body. The minimum requirement is the accreditation according to ISO 17025, standard method for assessing characteristic of quality for testing laboratory.

Documentation Provided to Competent Body

The technical file containing all the information, test report and all the declarations with the results of the tests carried out for assessing the conformity to the criteria, are submitted to the competent body. In the technical file it has to be included the list of the periodical control in order to keep under constant vision.

A part very important is the control quality system that will have to be well explained using block system graphic in order to evaluate all the passage able to confirm the quality control.

After this application form, the Competent body will begin the process of control of the respect of the criteria. The competent body will ask explanation if there is some value to clarify and after the enquiry an audit in the manufacturing place will be carried out in order to verify the respect of the declared system of production and the reliability of the quality system of the applicant.

After the audit, the competent body will release the authorisation to the use of the flower Eco-label

Enquiry by the Competent Body

The control of the criteria carried out by the Competent Body allows checking if all the criteria for the Eco-label are respected. It could be possible that before the end of the enquiry the Competent Body ask some correction in the documentation. In some case the control can be stopped when some criteria does not conform to the requirements.

The enquiry is also necessary in order to verify the mode put in practice by the applicant to warranty the respect of the criteria during the time of producing the Eco-label footwear production.

The audit in the production plants allows the Competent Body to verify the efficiency of the procedure fixed by the applicant for the organization.

The recommendation of ISO 9001 standard is base point for verifying this part.

Contract for Use of the Eco-label

After the final evaluation, the applicant is requested to sign the contact for the use of the Eco-label in the terms foreseen by the regulation 1908/2002/C

4.4 The Criteria

4.4.1 Overview

Introduction

- Decision of the Commission 231/2002/CE - it contains the criteria established for the award of the Eco-label still valid until March 2010
- there is a new COMMISSION DECISION number 2009/563/CE approved on July the 9th 2009 on establishing the ecological criteria for the award of the Community Eco-label for footwear

Matters covered by Criteria

- Residue in the final product
- Emission from the production of the materials
- Use of harmful substances (up until purchase)
- Use of volatile organic compounds (VOCs) during final assembly of shoes
- Use of PVC
- Energy Consumption
- Electric components
- Packaging of the final product
- Information on the packaging
- Information appearing on the eco-label

- Parameters contributing to durability

4.4.2 Criteria 1 Residues in the Final Product

Chromium VI

Chromium VI is residual in some tanning process. The residual of chromium VI must be absent in all part in leather. The limit of 10 mg/kg is correlated

To the old method used for determining Chromium VI and the limit of detection of the method.

CEN/TC 289 which studies the test methods for leather approved the new method, the ISO 17075 (as requested in the new criteria) which has as limit of detection 3 mg/kg. Considering that, the limit of acceptability of Chromium VI is absent; condition verified when Chromium VI is less than 3 mg/kg.

Cadmium, Lead and Arsenic

The content of Cadmium, Lead and Arsenic is determined on the whole footwear with a specific method described in the Decision of the Commission 231/2002/CE separating the upper part of the footwear from the bottom and after grinding the separated parts, wet digestion of a portion and determination of the content of the metals with atomic absorption spectrophotometer. The limit of 100 mg/kg also in this case represents the limit of detection of the method.

Functional Unit

It is important to observe that the size of the footwear is fixed in the size 40 points Paris. This will be valid for any determination carried out on the whole footwear for the criteria Eco-label

Formaldehyde

Formaldehyde content. Tests are carried out in any materials component the footwear, when these materials are leather or textile.

There is the possibility to have some materials which are not textile and is not possible leather to consider it as leather. In example the regenerated leather. In this case the limit is to be considered the limit for textile of 75 mg/kg

4.4.3 Criteria 2 Emissions from the Production of Material

COD from Tannery

The reduction of the COD of waste water is an important instrument for assessing the reduction of pollution due to production of raw materials. To assess the criteria is possible to control the COD at the end of tannery process and after the process of cleaning and depuration of waste water with the ISO 6060. In this case the procedure shall be included in the periodical control which is to be foreseen for maintaining the Eco-label licence.

In Europe the regulation 152/99 regarding the treatment of waste water, give prescription for depuration system which include the limit of COD in waste water. This limit is 162 mg/l of COD. the knowledge of the waste water COD allow to calculate the reduction of COD carried out by the tannery through a depuration system.

This procedure will be easily allowed considering the high number of tannery which achieves the certification according with ISO 14001 regarding the environment management system.

Chromium III in Wastewater

The verification of these criteria could be done considering that the depuration system must be release water after treatment with a content of Chromium III less

than 5 mg/l.

Verification is carried out with EN 1233 / ISO 9174 / EN ISO 11885.

4.4.4 Criteria 3 Use of Harmful Substances

PCP and TCP

The content of PCP and TCP and it salt and ester is forbidden in RFT in all products and the research is carried out especially on leather and textile. The different limit is correlated with the method used for the determination and also because the leather, for this kind of testing, is a matrix more difficult to analyse and for the possibility of pollution of the sample due to some process of manufacturing.

Azo Dyes

Azo dyes are forbidden in all European Community by the European Directive 2002/61/CE and at the moment included in the Annex XVII of the R.e.a.c.h.

The limit of detection is fixed in 30 mg/kg even if new testing could allow to decrease at 20 mg/kg this limit even if the limit of 30 mg/kg still remain in the new criteria version

The limit of detection is fixed in 30 mg/kg even if new testing could allow to decrease at 20 mg/kg this limit even if the limit of 30 mg/kg still remain in the new criteria version

N- Nitrosoamine

The following N-nitrosoamine shall be absent:

- N-nitrosodimethylamine (NDMA);
- N-nitrosodipropylamine (NDPA) ;
- N-nitrosodiethylamine (NDEA) ;
- N-nitrosodibutylamine (NDBA) ;
- N-nitrosopiperidine (NPIP);
- N-nitrosopyrrolidine (NPYR);
- N-nitrosomorpholine (NMOR);
- N-nitroso N-methyl N-phenylamine (NMPhA);
- N-nitroso N-ethyl N-phenylamine (NEPhA).

Chemicals sometimes presents in rubber – Test method: EN 12868.

N-nitrosoammine are additives used in manufacturing rubber. This test method is related to the control of this parameter in the objective for the use intended for children, for nipple in rubber. At the moments no specific test method for footwear materials.

C10-C13 Chloroalkanes

An official method is not known at the moment for the determination of the content of chloroalkanes C10 C13 in leather or textiles. The declaration of the applicant and the suppliers is the only way to assess the criteria.

The applicant will declare to have requested raw materials in with are not been used chloroalkanes in manufacturing and the supplier will confirm.

We have always to keep in mind that a declaration is not a simply written document, but it will contain the real state of the products.

Nickel

In the study of the criteria was not included the release of nickel. In any case an European Directive 94/27/CE give limits to release of nickel from metallic parts in direct and longer contact with the user. Now this directive is expired and the text is in the Annex XVII of the R.e.a.c.h.

4.4.5 Criteria 4. Use of Volatile Organic Compounds

Limits for VOCs

The use of volatile organic compound (VOCs) during final footwear production, for the following categories, shall not exceed the limit of:

- General sport – school footwear – occupational, men's town – cold weather – casual and women's town: g 25 VOC/pair;
- Fashion – infants - indoor: g 20 VOC/pair

About VOCs

The pollution of the atmosphere is a very important factor to be considered in the life cycle study of the industry of footwear. In fact, a lot of working phases include the use of solvent-based adhesive and, in the finishing the use of solvent-based polish.

In the last years industry studied a lot of water-based adhesive. These adhesives are obviously more environmentally friendly and safer for the worker. They still have to solve some problems in application, including the gap in adherence and tenacity respect the solvent-based adhesive which have reach a high grade of performance.

The calculation includes the kind of footwear studied, and the amount of the adhesives and polish used.

VOC Solvent Used in Footwear

It has to be considered all kind of products used in the manufacturing of footwear which contain these solvents.

A large part of VOCs are in the adhesive but also others compounds must be considered.

Mono-component adhesives are ready to use. After evaporation of the solvents, the solid part of the adhesive take a process of cross linking which allow the adhesive to grip to the substrate without any additive.

The bi-component adhesives need a cross linking agent in order to begin the process of cross linking and reach a tenacity able to allow the joint of the parts. These cross linking agents are usually iso cyanide dissolved in toluene or ethyl acetate

All the adhesives are dangerous. In any case there are some solvents which are not allowed to use, i.e. benzene, and are included in the Annex XVII of R.e.a.c.h.

Main Use of Solvent-based Adhesives

The main use of solvent based adhesives is in the joint sole and upper because in this assembling is requested the main strength of adhesion and the solvent base adhesives are the best products still in commerce. In any case the industry has reduced the gap in this application and the use of water base adhesive is going to increase gradually. This Eco-label system could be a way to get this increasing faster

These solvent are admitted in use, the meth ethyl chetone is regulated in quantity which have to be less than 20% by weight. The others are always chemicals and there are always the need to control the use because some problems can rise using these products

Water-based Solvents

For leather is present a large number of products in water solution or emulsion, the use of solvents in this case decrease quickly

The use of water based finish products it is today very large in footwear industry.

Calculation of VOC

The calculation of the use of VOCs goes through the sum of all VOCs from any products with solvent used in the manufacturing process.

The first step is the calculation of the volatile fraction of the adhesive/compound.

For cross linking agent it has to be considered that they are used in amount of 5% by weight for polyurethane adhesives.

In the criteria the method to test the dry residual of adhesives is not indicated. There is a ISO method that could be considered good for use.

First of all divide the polyurethane adhesives from the polichloroprenic. Calculate the volatile fraction of any adhesive and the addition will give the results per pairs.

For cleaning agent, in this case it was used for cleaning the sole and the cross linking agent is added in amount of 5% by weight to the polyurethane adhesives.

The calculation of the amount of adhesive and cleaning and cross linking agents are made in respect on the amount of these products for assembling a relative high number of pairs of footwear. This criteria will be periodically controlled using the data from the production and this control will be included in the controls carried out during production of the Eco-label footwear

4.4.6 Criteria 5 Use of PVC

Requirement

The footwear shall not contain P.V.C.

P.V.C. is usually used for outsoles and coated fabric for upper materials.

P.V.C. can be detected by infrared technique

Manufacturer shall provide a declaration in compliance with this criterion.

P.V.C. may, however, be used for making outsoles when this P.V.C. does not contain some phthalate and is derivate from recycled P.V.C.

The phthalate which has to be avoided are: DEHP (dietilesiphtalate), BBP (butilbenzilphtalate) or DBP (dibutilphtalate).

There is not an official method for determining the content of phthalate, but in EN 14602 is reported the ISO 18556 for determining the phthalates. At the moment the CEN/TC 309 WG2 is going to propose a new method, similar in application

4.4.7 Criteria 6 Energy Consumption

Requirement

The applicant is requested on a voluntary basis to give information on the energy consumption per pair of footwear. No limits are fixed. It is a data to keep under control.

It gives the opportunity to study any improvement for energy saving.

4.4.8 Criteria 7 Electric Components

Requirement

Footwear shall not contain any electric or electronic device

- It involves electric or electronic device
- All the methods used for antistatic system in occupational footwear are not considered electric device.

Criteria to avoid the use of mercury.

Comment

It is necessary to do a visual check in order to assess the absence of any electrical or electronic device to assess the conformity to this criteria.

A particular case regards the professional footwear with antistatic property. Is the antistatic device to be considered as electrical device?

In some cases, there is a small part of copper in contact with the ground and with the sock allowing the dispersion of static electricity.

At the moment. This apparatus is not considered as electrical device.

4.4.9 Criteria 8 Packaging of the Final Product

Requirements

Packaging for the final product, shall be made with recycled material:

Where cardboard boxes are used for the final packaging, they shall be made with a minimum of 80% recycled material.

Where plastic bags are used for the final packaging of footwear, they shall be made from (all) recycled material.

Assessment and verification with producer declaration of conformity at this criterion.

The packaging is part of the life cycle of footwear and it must come from recycled materials. The declaration involve the responsibility of the producers and the suppliers

4.4.10 Criteria 9 Information for Users

User Instructions

The following information (or equivalent text) shall be supplied in the web site:

http://europa.eu.int/ecolabel

Informative Annex

The informative annex shall report all information regarding the use of footwear, the instruction for repairing it, the mode of maintenance and the disposal of footwear after the end of useful life of the footwear itself

Informative annex

General information

All materials used have good technical resistance to stress in order to give good performance in order to give good resistance in the daily use.

Materials were not treated with a water proof agent and the eventual water proof treatment is not suggest in order to avoid any use of chemicals, particularly Volatile Organic Compound.

Preparation of footwear

It is possible to repair all part of the footwear. Repairs it give longer life to the footwear. Repair it before get it away.

The detach of the sole from the upper can be repaired bonding the detached parts carried out by a shoes repairer.

Heels can be jointed to the sole in case of the detach.

Upper can be stitched when some parts fail.

Cleaning and maintenance procedure

It is a very important procedure. For cleaning footwear don't use chemicals products but only brush it using a wet brush. For leather use a water based wax for leather to clean it.

Disposing of footwear

At the need of use of footwear, recycle it when possible. If not, dispose the footwear according with the rules in order to limit the environment impact

4.4.11 Criteria 10 Information Appearing on the Eco-label

Requirement

On the box of footwear shall be written:

- *low air and water pollution,*
- *harmful substances avoided.*
- *'For more information visit the EU Eco-label web-site: http://europa.eu.int/ecolabel'*

4.4.12 Criteria 11 Parameters Contributing to Durability

Requirement

The minimum performance requirements for components and whole footwear are included in order to have the warranty of comfort and durability of the footwear in order to reach a life of the product. The values are studied for a life of at least one year of use.

Requirements are studied by CEN/TC 309 WG1 which has published minimum requirements for any kind of footwear.

Professional Footwear

The possibility to achieve the Eco-label is also for the professional and protective footwear. These kind of footwear are not included in the list of footwear took by CEN/TC 309 because the characteristic of these are under the competence of other Technical group.

These footwear, if for the others criteria they have to comply it, for the durability parameters they are exempted.

The certification as professional footwear is granted following the presumption of conformity at the European standard:

- EN 20344
- EN 20345
- EN 20346
- EN 20347

The CE type certification is released by a Notified Body officially licensed by European Community for this kind of certification.

EU Law on Personal Protective Equipment (PPE)

The Council Directive 89/686/EEC of 21 December 1989, on the approximation of the laws of the Member States relating to personal protective equipment, prescribes the mandatory certification of all PPE, including footwear.

To put in the market footwear as personal protective equipment the Ce type certification granted by a Notified Body and assessed after verification of the conformity to the main harmonised standard is mandatory.

Any notified body has a singular identification number which the European Community, by the intermediate of the competent ministry of single member country, give to allow the Certification activity. This number is progressive and is public giving exact identification of the certification Body

Standards

EN 20344:2004 specifies methods for testing footwear designed as personal protective equipment.

EN 20345:2004 specifies basic and additional (optional) requirements for safety footwear.

EN 20346:2004 specifies basic and additional (optional) requirements for protective footwear.

EN 20347:2004 specifies basic and additional (optional) requirements for occupational footwear.

Types of Footwear

The footwear is divided, following the destination of use, in these kind of footwear. The requirements are different according to the different stress the footwear have to support.

- General sport
- School footwear
- Casual
- Men's town
- Cold weather footwear
- Women's town
- Fashion
- Infant footwear
- Indoor
- Professional footwear

Requirements for Different Parts of the Footwear

Requirements are fixed for upper, outsole, lining and whole footwear. Upper and outsole must pass some requirements of stress during the normal use of the footwear, the whole footwear is tested in order to have a minimum strength of separation sole / upper, lining is verified in order to give a minimum colour fastness resistance

Flex Resistance

The value of flex resistance, expressed in cycle with no visible crack are these

General sport	dry: 100	wet: 20
School footwear	dry: 100	wet: 20
Casual	dry: 80	wet: 20
Men's town	dry: 80	wet: 20
Cold weather footwear - 20°C: 30	dry: 100	wet: 20

	Women's town	dry: 50	wet: 10
	Fashion	dry: 15	
	Infant footwear	dry: 15	
	Indoor	dry: 15	

Tear Strength	**Tear strength – average strength in N**		
	General sport	leather: 80	other material: 40
	School footwear	leather: 60	other material: 40
	Casual	leather: 60	other material: 40
	Men's town	leather: 60	other material: 40
	Cold weather footwear	leather: 60	other material: 40
	Women's town	leather: 40	other material: 40
	Fashion	leather: 30	other material: 30
	Infant footwear	leather: 30	other material: 30
	Indoor	leather: 30	other material: 30

Flex Resistance After 30 kc	**The value of flex resistance, after 30 kc expressed as increasing of cut in mm, with no visible crack are these**	
	General sport	$\leq$ 4
	School footwear	$\leq$ 4
	Casual	$\leq$ 5
	Men's town	$\leq$ 6
	Cold weather footwear	$\leq$ 6 nvc at – 10 °C
	Women's town	$\leq$ 8
	Fashion	
	Infant footwear	
	Indoor	

Tear Strength - Average	**Tear strength – average strength in N**		
	General sport 0.9 g/cm3: 6	D $\geq$ 0.9 g/cm3: 8	D <
	School footwear 0.9 g/cm3: 6	D $\geq$ 0.9 g/cm3: 8	D <
	Casual 0.9 g/cm3: 6	D $\geq$ 0.9 g/cm3: 8	D <
	Men's town 0.9 g/cm3: 4	D $\geq$ 0.9 g/cm3: 6	D <
	Cold weather footwear 0.9 g/cm3: 6	D $\geq$ 0.9 g/cm3: 8	D <
	Women's town 0.9 g/cm3: 4	D $\geq$ 0.9 g/cm3: 6	D <

Fashion	D ≥ 0.9 g/cm3: 5	D < 0.9 g/cm3: 4
Infant footwear	D ≥ 0.9 g/cm3: 6	D < 0.9 g/cm3: 5
Indoor	D ≥ 0.9 g/cm3: 5	D < 0.9 g/cm3 4

Abrasion Resistance

Abrasion resistance – Expressed in : D ≥ 0,9 g/cm3 (mm3) and D < 0,9 g/cm3 (mg)

General sport	D ≥ 0.9 g/cm3: 200	D < 0.9 g/cm3: 150
School footwear	D ≥ 0.9 g/cm3: 250	D < 0.9 g/cm3: 170
Casual	D ≥ 0.9 g/cm3: 200	D < 0.9 g/cm3: 150
Men's town	D ≥ 0.9 g/cm3: 350	D < 0.9 g/cm3: 200
Cold weather footwear	D ≥ 0.9 g/cm3: 200	D < 0.9 g/cm3: 150
Women's town	D ≥ 0.9 g/cm3: 400	D < 0.9 g/cm3: 250
Fashion	D ≥ 0.9 g/cm3:	D < 0.9 g/cm3:
Infant footwear	D ≥ 0.9 g/cm3:	0.9 g/cm3:
Indoor	D ≥ 0.9 g/cm3: 450	D < 0.9 g/cm3 300

Colour Fastness

The colour fastness resistance is carried out using 50 cycles wet and the requirement is grade 2/3 of the grey scale excluding fashion footwear

Sole Bonding

The values of upper sole bonding resistance expressed in N/mm are:

General sport	≥ 4.0
School footwear	≥ 4.0
Casual	≥ 3.0
Men's town	≥ 3.5
Cold weather footwear	≥ 3.5
Women's town	≥ 3.0
Fashion	≥ 2.5
Infant footwear	≥ 3.0
Indoor	≥ 2.5

4.5 New Commission Decision and Criteria

Introduction

Decision of the Commission 2002/231/CE is out of date.

Criteria are still valid until march 2010.

There is a new COMMISSION DECISION number 2009/563/CE approved on July the 9th 2009 on establishing the ecological criteria for the award of the Community Eco-label for footwear.

The Criteria Changed	The differences announced in the new proposal involve the: - Criteria N° 1; - Criteria N° 2; - Criteria N° 3; - Criteria N° 4; - Criteria N° 5; - Criteria N° 6
Criteria 1 Residues in the Final Product: **Formaldehyde**	The amount of free and hydrolysated formaldehyde of the components of the footwear shall not exceed the following limits: Textile: not detectable; Leather: 150 mg/kg *Assessment and verification:* the applicant and/or his supplier(s) shall provide a test report, using the following test methods: Textiles: EN ISO 14184-1 (detection limit: 20 ppm); Leather: EN ISO 17226-1 or 2.
Criteria 2 Emissions from Production: **COD**	The COD criteria are changed and moreover it will be considered the water consumption for tanning process. The way to assess the criteria is not yet decided. Hide is defined as 'the outer covering or a mature or fully-grown animal of the larger kind, e.g. cattle, horses, camels, elephants, etc. …' Skin is defined as 'the outer covering of an animal of the smaller kinds, e.g. sheep and goats, or of the immature animals of the larger species, e.g. calves. Pigs, reptiles, birds and fish are included under skins'. (*International Glossary of Leather Terms, ICT*). The COD is now considered as maximum limit of 250 mg/l. Even if is not yet decided the way to assess the criteria, the standard method ISO 6060 Is available.
Discharge to Municipal Wastewater	a) If the waste waters from leather tanning sites are released into a municipal waste water treatment plant/facility, then the previous criteria shall not apply, as long as it can be demonstrated: - that the discharge of waste water from the tanning site into the municipal waste water supply is authorised and; - that the municipal waste water treatment facility is operational and that the subsequent discharge of treated water into the fresh water system is in line with minimum EU requirements according to Council Directive 91/271/EEC of 21 May 1991 concerning urban waste-water treatment.
Chromium III	b) Tannery waste water after treatment shall contain less than **1 mg/l of** Chromium (III).
Criteria 3 Use of Harmful Substances: **PCP & TCP**	Pentachlorophenol (PCP) and Tetrachlorophenol (TCP) and its salts and esters shall not be used. *Assessment and verification:* the applicant and/or his supplier(s) shall provide a declaration that the materials do not contain such chlorophenols along with the following test methods: Leather, EN ISO 17070 (limit of detection 0.1 ppm); Textile, XP G 08-015 (limit of detection 0,05 ppm)

Dyes

The following dyes classified as carcinogenic, mutagenic or toxic to reproduction shall not be used to dye the materials used for the final product assembly:

C.I. Basic Red 9

C.I. Disperse Blue 1

C.I. Acid Red 26

C.I. Basic Violet 14

C.I. Disperse Orange 11

C. I. Direct Black 38

C. I. Direct Blue 6

C. I. Direct Red 28

C. I. Disperse Yellow 3

Assessment and verification: the applicant shall provide a declaration of non-use of such dyes.

NPE and PFOS

Nonylphenol ethoxylate (NPE) and Perfluorooctane sulfonate (PFOS) shall not be used.

The standard test method is not available at the moment but is possible determine these chemicals with gas-chromatographic analysis.

Sensitising Dyes

The following substances classified as “potentially sensitising dyes” shall not be used:

C.I. Disperse Blue 3 - C.I. 61 505C.I.

Disperse Blue 7 - C.I. 62 500C.I.

Disperse Blue 26 - C.I. 63 305C.I.

Disperse Blue 35C.I.

Disperse Blue 102C.I.

Disperse Blue 106C.I.

Disperse Blue 124C.I.

Disperse Brown 1C.I.

Disperse Orange 1 - C.I. 11 080C.I.

Disperse Orange 37C.I.

Disperse Orange 76(previously designated Orange 37)C.I.

Disperse Red 1 - C.I. 11 110C.I.

Disperse Orange 3 - C.I. 11 005C.I.

Disperse Red 11 - C.I. 62 015C.I.

Disperse Red 17 - C.I. 11 210C.I.

Disperse Yellow 1 - C.I. 10 345C.I.

Disperse Yellow 9 - C.I. 10 375C.I.

Disperse Yellow 39C.I. Disperse Yellow 49

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion.

Criteria 4: **VOCs**	The total use of VOCs during final footwear production shall not exceed, on average, 20 gram VOC/pair. *Assessment and verification:* the applicant shall provide a calculation of the total use of VOCs during final shoe production, together with supporting data, test results and documentation as appropriate, with the calculation made using EN 14602. (Registration of purchased leather, adhesives, finishes and production of footwear during at least the last six months is required.)
Phthalates	Only phthalates that at the time of application have been risk assessed and have not been classified with the phrases (or combinations thereof): R60, R61, R62, R50, R51, R52, R53, R50/53, R51/53, R52/53, in accordance with Directive 67/548/EEC and its amendments, may be used in the product (if applicable). Additionally DNOP (di-n-octyl phthalate), DINP (di-isononyl phthalate), DIDP (di-isodecyl phthalate) are not permitted in the product. *Assessment and verification*: The applicant shall provide a declaration of compliance with this criterion.
Criteria 5	Byocide: Only biocide products containing biocidal active substances included in Annex IA of the Directive 98/8/EC of the European Parliament and of the Council, and authorised for use in footwear, shall be allowed for use. *Assessment and verification:* The applicant shall provide a declaration that the requirements of this criterion have been met along with a list of biocide products used. *Assessment and verification*: The applicant shall provide a declaration of compliance with this criterion This criteria was added in order to avoid the use of some dangerous biocide. In Europe at the end of 2008 and the beginning of 2009 raised a important problem with the use of a specific biocide, the dimethylfumarate, used with the silica gel to avoid the degradation of materials when the material itself is transported for long time in hot and wet condition. There is a specific European Directive 2009/251/CE for the restriction of the use of dimethylfumarate. The limit in the material, usually leather and textile is 0.1 mg/kg maximum. There is not yet a standard method for determining the dimethylfumarate
Criteria 6 **Energy**	The energy consumption at the manufacturing stage shall be calculated and declared. The calculation of energy expressed as AEC is requirement mandatory and the new Decision will give the method to determine the total consumption of energy The average electric consumption (AEC) for each pair of shoes can be calculated two ways: On the base of the standard daily production of the plant: MJdp = direct energy used in daily production [electricity + fossil fuels] as annual average; N = number of shoes daily produced as annual average. AEC = MJdp/N On the base of the effective eco-labelled production of the plant: MJep = MJ used in the production of the Ecolabelled shoes [electricity + fossil fuels] as annual (annual data);

Nep = number of Ecolabelled shoes produced as annual data.

AEC = MJep/Nep

Criteria N° 7 The reference to the impossibility to use electrical and electronic device were removed from the criteria

4.6 Success Stories

Firms in Italy with Eco-label

ALMAR

Lewer

Over Teak

Tacconi

T.P.S.

3A Antonini

Gazzoni Ecologia

Sabatini

Soldini

Negri

4.7 Exercises

4.7.1 Exercise 1: Material for a Footwear Eco-label

Introduction

This exercise will consider the Ecolabel criteria for footwear and how to find a footwear product that will meet the EU eco-label criteria. The exercise will study the materials to use, the problems regarding the materials and manufacturing issues. The aim is to complete an application and technical documentation to meet the EU eco-label requirements.

Instructions

The various materials which are used and the complexity of assembling a footwear product will be considered.

The criteria of 2002 and the new version will be used as well the user manual.

The specific test and assessment for materials will be looked up, with particular regard for leather and textile.

With respect with the kind of footwear considered, the performance of the parameters contributing to durability for any raw material will be determined. At the same time the characteristic of the final product, the footwear will be assessed to check the conformity of the product to the Ecolabel criteria.

Leather, textile, rubber, polymers etc.

Participants will examine the documents and testing requirements to demonstrate the conformity of different materials

4.7.2 Exercise 2: VOC Calculations

Introduction	The VOC emission is an important part of the criteria and a calculation of the emission from the solvent base adhesives used in manufacturing processed has a large significance.
Instructions	In manufacturing a footwear product it is important to know which parts are joined with adhesives: i.e. sole/upper, lining and upper etc. The kind of adhesives and the amount used will be considered and VOC calculated.
Test methods	In order to do the calculation, the nature of the adhesives needs to be known. Also important is the method of analysis to use to have the correct information to calculate the VOC.
Adhesives	Products which are largely used in footwear manufacturing.
Washing solvent	These enter in the calculation of the VOC.
Cross linking agent	Chemicals which have a large component of solvent
Finishing products	Wax and repairing agent sometimes solvent based
The final calculation	Aim of the exercise is to check the correct application of the criteria for VOC in project of a line of products.

4.7.3 Exercise 3: Informative Annex

Introduction

A criterion, in the 2002/231/CE decision and in the new one, is dedicated to the information to give to the user. The entirety of information gives a correct and efficient presentation of the product to the final user.

Instructions

On the basis of the criteria regarding the information to be given and the type of footwear in object,

Review the requirements in the Informative Annex about information that must be provided to customers about footwear.

Answer the following questions:

Why is it important to provide information?

What information is required for Ecolabel footwear?

Which different information is required for the following kinds of footwear?

General sport

School footwear

Men's town

Casual

Women's town

Cold weather

Fashion

Infants

Indoor

Occupational

4.8 Case Study 1: Calzaturificio Fratelli Soldini

Location Information	Capolona (AR) Italy

Summary/Overview or Introduction description Example of footwear industry with production of footwear for men and footwear professional.

Professional footwear	The production of professional footwear directly linked with the development of the integrated certification and the application of the GPP green public procurement.
Type of production	The Calzaturificio F.lli Soldini is the first firm which achieved the Ecolabel certification in Italy, second in Europe and is the firm with a large production certified. The production of professional footwear and the normal use footwear are equivalent. The normal footwear are revised with new models any new seasonal production.

5 Module B3 Televisions

5.1 Introduction

5.1.1 About this Module

Introduction

Participants will:

- Receive general information about the product group definition procedure and the evolution of the television product group.
- Learn about the Eco-label criteria for televisions and the assessment and verification system.
- Learn how to prepare an application and how to compile the documentation needed to justify the fulfilment of every criterion.
- Receive information about the test methods mention into the criteria and the related European legislation.
- Become familiar with the application process for getting products awarded with the European Eco-label and the stakeholders involved.
- Participants will be informed about the available tools to promote this product group in their countries: Eco-label website, brochures and Green store.

Programme

- Introduction – EU-Eco-Label Website and Key References
- Application process
- Eco-Label criteria for televisions

LUNCH

- Eco-Label criteria for televisions
- Making an Application – Exercises
- Questions and Further Discussion

5.1.2 EU Eco-Label Website and Key References

The Criteria Document

Criteria for the Eco-label for televisions take into account the various environmental impacts at each stage of the product's life, especially energy consumption. These criteria are listed in the formal Commission Decision of 12 March 2009 establishing the criteria for the award of the Community Eco-label to televisions (2009/300/EC).

An electronic copy of the Commission Decision is in the Module B3 Resource Materials and hard copy is included with the Training Handbook (Resource 1).

Background Documents

The last revision of the criteria for televisions was led by the UK Competent Body with the technical support of the AEA technology consultancy. The results of the discussion process are summarized in the document 'Revising the Eco-label Criteria for Televisions. Final Report. April 2008'.

An electronic copy of the Final Report is in the Module B3 Resource Materials (Resource 2).

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EU Eco-label

There is a specific website of the European Eco-label:

Website

http://ec.europa.eu/environment /Eco-label/index_en.htm

In the website there is specific information about the EU Eco-Label, the product group criteria, the meetings scheduled, the main contacts, a new space for Frequently Asked Questions and a list of Useful links, for example, the link of other Eco-Labels that meet the ISO 14024, Environmental labels and declarations, type I Environmental labeling.

There is also a specific section with the promotional materials: general brochures, specific brochures for each product group for the consumers and producers, flyers and the rules of the use of the logo.

Contacts

In the Website are available the main interesting contacts details of the European Eco-Label. For general information about the European Eco-label you can contact with the EU Eco-Label Helpdesk. There is also a list of the current Competent Bodies per country. Finally there is a list of the interest groups involved in the definition and revision of product groups of the EU Eco-Label: members of European associations of the industry and of the retailers, environmental and consumers' organizations and Trade unions.

Concerning the product group of TVs it is important to keep in mind the contacts of the Competent Bodies that have awarded the Eco-label to televisions, the Competent Body of Catalonia (Spain), the UK Competent Body and the Swedish Competent Body.

Green Store

All the products awarded with the European Eco-label are included into the Green Store: http://www.eco-label.

This website allows citizens and companies to look up the companies or distributors with products awarded with the EU Eco-label, and the list of products certified. It is possible to do searches for the product group or country. The catalogue is available in 21 languages. The holders have a personal access to update the information.

5.1.3 Introduction to EU Eco-Label Application Process

Process Steps

First of all, the applicant has to verify that the organizations meet all the environmental legal requirements; for instance, the manufacturing plants must have the licence in force.

At the same time the applicant has to check that the products comply with the Eco-labelling and do the required tests. The applicant has to compile a dossier with the documents that shows the fulfillment of each criterion: self-declarations, declarations of the suppliers of raw materials and components, test reports, copies of the documentation for the consumers (user manual, labeling, packaging, etc.).

This dossier together with the Application form have to be delivered to the Competent Body or, if it is the case, to the independent third party to be verified.

Finally, if the application is successful, the Competent Body awards a licence to use the Eco-label under the terms of the standard contract. The Competent Body notifies the award to the Helpdesk of the EU Eco-label to be included into the European catalogue.

An electronic copy of the Commission Decision on the Standard Contract is included in the Module B3 Resource Materials (Resource 3).

Who can apply

Applications for the Eco-label may be submitted by manufacturers, importers, service providers, traders and retailers. The two last-named may submit applications only in respect of products placed on the market under their own brand names.

Which CB to apply to

The application shall be presented to a competent body in accordance with the following:

- where a product originates in a single Member State, the application shall be presented to the competent body of that Member State;
- where a product originates in the same form in several Member States, the application may be presented to a competent body in one of those Member States. In such cases the competent body concerned, in assessing the application, shall consult the competent bodies in those other Member States;
- where a product originates outside the Community, the application may be presented to a competent body in any one of the Member States in which the product is to be or has been placed on the market.

New applications, renovations, modifications and extensions of the licence

When a company wants to do new applications the company has to refer to a product placed or a range of products placed on the market. They shall submit to the competent body the Application form and the dossier.

When the published criteria for a product group are revised, licensees can renew their contracts under a simplified procedure. This requires the applicant to sign a declaration that the product still complies with those criteria which have not been altered, and that the eco-labelled product meets the new requirement criteria. For these new criteria, applicants have to justify the fulfilment with a dossier.

A new application is not required for modifications in product characteristics which do not affect compliance with the criteria. These applicants shall send to the Competent Body the name of the eco-labelled product, the number of the Eco-label licence, a description of how the modification affects the eco-labelled product, and a confirmation that the product formulation is already covered by the dossier submitted with the original applications and the product is still in complete conformity with the Eco-label criteria.

Forms

The applicant has to provide two documents to the Competent Body: the **Application Pack** and the **Dossier** including the documentation to verify the statements of the Application Pack.

Taking as example televisions product group:

1. **Application Pack of the European Eco-label for televisions**.

An electronic copy of the Application Pack is included in the Module B3 Resource Materials and a hard copy is included with the Training Handbook (Resource 4).

The first part of the Application pack includes information about the company and the products of the application.

The second part of the Application pack includes information about the fulfillment of the criteria.

2. **The dossier has to include the documentation below**:

a. Test reports:

- Disassembly test report.

- Energy consumption test using the procedure in IEC 62087: Methods of measurement for the power consumption of audio, video and related equipment.

b. Photograph of the hard-off switch.

c. Signed certificate from the applicant declaring compliance with the European Eco-label requirements.

d. Signed declaration from the raw materials providers (plastics and frame retardants suppliers and lamps providers).

e. Copy of relevant Material Data Safety Sheets.

f. Copy of the User manual.

g. An illustration of the proposed usage of the Eco-label on the product, packaging and other accompanying documentation.

Some Competent bodies do themselves the verification of the application and other ones had recognised independent verification bodies which verify the information provided by the applicant. In this last case it is also needed to provide the Verification form signed by the recognised verification body. In any case competent bodies shall collaborate in order to ensure the effective and consistent implementation of the assessment and verification procedures.

It is necessary contact with every competent body to know the verification procedure that they follow.

Contents of the Application Pack

a. The applicant
- Name of applicant company
- Address
- Contact name
- Contact details
- Website
- In what capacity are the company applying for the Eco-label

b. The product
- Trade name of product
- Internal reference number
- Type of product
- Main composition
- Name and address of manufacturing site (if different from the company)
- Where the product is made outside the EU
- Confirmation that product has been or will be place on the market in the EU
- EU countries in which this product is manufactured in the same form
- EU countries in which this product is sold
- Rough estimate of annual number of articles produced (units)
- Rough estimate value of annual sales in European Economic Area (ie the European Community plus Norway, Iceland and Liechtenstein) of the product at ex-factory prices (€)

c. This application
- Is the first application for the EU Eco-label for this product?
- Is this an application to add a new product to a licence for a product range already covered by an Eco-label?
- Other environmental labelling schemes under which the product has already been registered, such as the Nordic Swan.
- Assessment and certification method used (certified self-assessment / independent third party assessment):
- The approved test centre is:
- Fee reduction that company claims:
- Model of applicant declaration.
- Check list of the criteria and the documentation to deliver in the Dossier.

Legal compliance

The Competent Body also checks that manufacturing plants comply with the legislation, especially concerning environmental issues, for instance, water and waste treatment.

A documentation revision shall be enough to find out this, but usually Competent Bodies make a visit to the manufacturing plants. It is also commune to contact with the Environmental Authorities of the country to get more information about

the legal compliance.

Licensing

Once the award was done, the Competent Body includes the award in its register and notifies the award to the European Eco-label Helpdesk. Then the award is included into the Green Store website. All new awards are also published into the European Eco-label Newsletter.

Information to include into the notification form:
- Details of Competent Body.
- Details of Licence holder.
- Details of Retailer selling own brand Eco-labelled products.
- Details of application.
- Specifications.
- Product description
- Important marketing information.

An electronic copy of the Notification of new Community Eco-label Award template is included in the Module 3B Resource Materials (Resource 5).

The licence will be in force until the end of the validity of the criteria. Then companies have to prove that products still fulfil the new criteria delivering a new application. Often the Commission Decision that defines new criteria sets a transition period for products awarded with the European Eco-label before the publication of the Commission Decision. During this transition period companies modify, if it is necessary, the awarded products to the new criteria.

Register Code

When a company has products awarded with the European Eco-label receive a register code. The register code gives information about the product group, the competent body which has awarded the Eco-label and the numeration of the application.

Here there is the example of televisions:

Every product group has a code number. The code number of the televisions product group is 022.

Every Competent Body has also a code. The Catalan Competent body has ES-CAT. And the Swedish Competent Body has SE.

Then there is the correlative numeration of the award. For example, SHARP is the first company with televisions awarded with EU Eco-label in Catalonia for this reason has the number 001, SONY is the second award for televisions in Catalonia then has the number 002, and SAMSUNG is the first award for televisions in the Swedish Competent Body then has the number 01.

Codes of the televisions companies with Eco-labelled products:

SHARP's register code: ES-CAT/022/001

SONY's register code: ES-CAT/022/002

SAMSUNG's register code: SE/022/01

If a company has products awarded by different Competent Bodies have also different register codes. For example, SHARP has also products awarded by the UK Competent Body then has also another register code.

Costs

An application fee must be paid to obtain the Eco-label and for the use of the Eco-label must be paid an annual fee.

The amount of the application fee is fixed by the Competent Body and must be from 300€ to 1.300€. It is important to contact with every Competent Body to know this fee. The small and medium enterprises could ask for a reduction almost

of 25% and the companies with headquarters located in a developing country could ask for a reduction almost of 25%. To know the concrete reduction's percentage it is necessary to contact the Competent Body.

The annual fee is 0,15% of annual volume of sales of the product within the European Union. When the applicant is a small and medium enterprise could ask for a minimum reduction of 25%. For applicants from developing countries it is set a minimum reduction of 25%. The first three applicants have a maximum reduction of 25%. At the end, if the product is awarded with another Eco-label, for instance, Blue Angel or Nordic Swan, could be a 30% reduction of the annual fee.

To know the exact reductions it is necessary to contact with the Competent Body.

These reductions may be cumulative and will be applicable to the resulting fee, not exceeding in any case 50%. The cost of components that are subject to the payment of an annual fee is deducted from the price of the product.

Electronic copies of the Commission Decisions on Fees (2000 and 2003) are in the Module 3B Resource Materials and hard copies are included with the Training Handbook (Resources 6 and 7).

Neither the application fee nor the annual fee includes the cost of testing products to which applicant products are subjected. These costs must be met by the applicant.

5.1.4 About the EU-Flower Specification

The Product Group

This product group shall comprise mains powered electronic equipment, the primary purpose and function of which is to receive, decode and display TV transmission signals.

History/Evolution

The product group was defined in 2002. It was defined in the Commission Decision of 25 March 2002 establishing the ecological criteria for the award of the Community Eco-label to television.

An electronic copy of the Commission Decision in 2002 on criteria for Televisions is in the Module B3 Resource Materials and a hard copy is included with the Training Handbook (Resource 8).

In 2007 the revision of this product group started and finalized with the Commission decision of 12 March 2009 establishing the revised ecological criteria for the award of the Community Eco-label to televisions. These criteria will be in force on 1st November 2009 until 31st October 2013.

For all that the criteria of 2002 are currently in force, but just until 31st October, for this reason the training will be focused in the new criteria of 2009.

Future Issues

The Commission Decision of 12 March of 2009 will be valid until 31 October 2013.

Existing EU Eco-label criteria were developed at a time when the television market was dominated by Cathode Ray Tube Technology. New criteria were focussed in Liquid Crystal Display and Plasma Display Panel technologies, and there was also an increasing of the size of the televisions. For all that, it is known that televisions technology is very changing and criteria shall be reviewed deeply.

Criteria Overview

The criteria defined in the Commission Decision are classified in different groups:

1. Energy savings
2. Mercury Content of Fluorescent Lamps
3. Life-time extension
4. Design for disassembly
5. Heavy Metals and Flame Retardants

6. User instructions
7. Information appearing on the Eco-label

5.2 The Criteria

5.2.1 Energy Savings

Passive Standby

The energy consumption of the television in mode Passive Standby could not be higher than 0,3 W. There is an exception if the hard off-switch is easily visible, and the consumption in off option is lower or equal of 0,01 W, the energy consumption in Passive Standby must be equal or lower than 0,5 W.

Maximum Energy

The total energy consumption of the television in on-mode shall not be higher than 200 W.

Energy Efficiency

The criteria about energy efficiency have three different limits:

If the on-mode power consumption is lower or equal than 0,64 · (20 W + A* · 4,3224 W/dm^2) the licence will be awarded until 31 December 2010.

If the on-mode power consumption is lower or equal than 0,51 · (20 W + A* · 4,3224 W/dm^2) the licence will be awarded until 31 December 2012.

If the on-mode power consumption is lower or equal than 0,41 · (20 W + A* · 4,3224 W/dm^2) the licence will be awarded until 31 October 2013.

*A is the visible screen area expressed in dm^2.

Companies will have to demonstrate that any of their Eco-labelled televisions fulfilled the criteria 3.c) Energy Efficiency for every period (31 December 2010 and 31 December 2012). If this cannot be demonstrated the competent body will only issue the Eco-label licence for the period for which compliance can be demonstrated.

Assessment and Verification

The television shall be tested for its on-mode power consumption in its condition as delivered to the customer, according to the revised IEC 62087 standard, using the dynamic broadcast video signal (Methods of Measurements for the Power Consumption of Audio, Video and Related Equipment). If the television has a forced menu upon initial start up, the default shall be the setting which is recommended by the manufacturer for normal home use. A test report shall be provided by the applicant to the awarding competent body demonstrating the television meets these requirements.

An electronic copy of a Checklist on Energy Test is in the Module B3 Resource Materials and a hard copy is included with the Training Handbook (Resource 9).

The tests reports could be done in-house, always with the competent body's approval, or in an external laboratory approved by the competent body, if it is possible a laboratory certified with the EN ISO 17025 standard.

Related Legislation

The criterion Energy Saving was defined taking into account the Directive EuP: Directive 2005/32/EC of the European Parliament and of the council of 6 July 2005 establishing a framework for the setting of ecodesign requirements for energy-using products and amending Council Directive 92/42/EEC and Directives 96/57/EC and 2000/32/EC of the European Parliament and of the Council, and in concrete the Commission Regulation of (…) implementing Directive 2005/32/EC of the European Parliament and of the Council with regard to ecodesign requirements for televisions. For this reason the limits of the Directive EuP and the limits of the European Eco-label criteria matches.

The Regulatory Committee adopted the minimum performance and labeling requirements for TVs on 30th March 2009.

Electronic copies of the Directive on ecodesign for energy using products and a copy of the Commission Regulation on ecodesign requirements for televisions are in the Module B3 Resource Materials (Resources 10 and 11)

The Paragraph 1 of the Annex I of the Commission Regulation implementing Directive 2005/32/EC is closely related with criterion 1.c) of the EU Eco-label for televisions.
The Paragraph 1 sets that the on-mode power consumption shall not exceed the following limits:
Full HD resolution: 20 W + A · 1,12 · 4,3224 W / dm^2
All other resolutions: 20 W + A · 4,3224 W /dm^2
From 1 April 2012 the limits will be:
All resolutions: 16 W + A · 3,4579 W / dm^2

The Paragraph 2 (2) (a) of the Annex I of the Commission Regulation implementing Directive 2005/32/EC is closely related with criterion 1.a) of the European Eco-label.
The Paragraph 2 sets the following limits:
a) Power consumption in "off mode" < 0,3 W
Exception: TVs with an easily visible switch (consumption ≤ 0,01 Watts) < 0,5 W.

5.2.2 Mercury Content of Fluorescent Lamp

Criteria

The total amount of mercury, in all lamps, per screen, shall be no greater than 75 mg for screens with a visible screen diagonal of up to and including 40 inches.

The total amount of mercury, in all lamps, per screen shall be no greater than 99 mg for screens with a visible screen diagonal of greater than 40 inches.

Assessment and Verification

The applicant shall provide a signed declaration that their television complies with these requirements. It shall include documentation on the number of lamps used and the total mercury content for the lamps, from suppliers.
An electronic copy of a Mercury Content Declaration is in the Module B3 Resource Materials and a hard copy is included with the Training Handbook (Resource 12).

5.2.3 Lifetime Extension

Criteria

The manufacturer shall offer a commercial guarantee to ensure that the television will function for at least two years. This guarantee shall be valid from the date of delivery to the customer.

The availability of compatible electronic replacement parts shall be guaranteed for seven years from the time that production ceases.

Assessment and Verification

The applicant shall declare the compliance of the product with these requirements. A copy of the User Manual shall be provided because these consumer rights shall be included in it.

Related Legislation

The first paragraph of this criterion is closely related with the directive 1999/44/EC of the European Parliament and of the Council of 25 May 1999 on certain aspects

of the sale of consumer goods and associated guarantees. The article 5 sets that the seller has to give a minimum period of two years of guarantee from the time of delivery for new products.
An electronic copy of the Directive on sale of consumer goods and associated guarantees is in the Module B3 Resource Materials (Resource 13).

5.2.4 Design for Disassembly

Criteria

The manufacturer shall demonstrate that the television can be easily dismantled by professionally trained recyclers using the tools usually to them, for the purpose of undertaking repairs and replacements of worn-out parts, upgrading older or obsolete parts, and separating parts and materials, ultimately for recycling.

To facilitate the dismantling fixtures within the television shall allow for its disassembly, e.g. screws, snap-fixes, especially for parts containing hazardous substances. Plastic parts shall be of one polymer or be of compatible polymers for recycling and have the relevant ISO 11469 marking if greater than 25 gr in mass. Metal inlays that cannot be separated shall not be used. Data on the nature and amount of hazardous substances in the television shall be gathered in accordance with Council Directive 2006/121/EC and the Globally Harmonized System of Classification and Labelling of Chemicals (GHS).

Assessment and Verification

A test report shall be submitted with the application detailing the dismantling of the television. It shall include an exploded diagram of the television labeling the main components as well as identifying any hazardous substances in components. It can be in written or audiovisual format. Information regarding hazardous substances shall be provided to the awarding competent body in the form of a list of materials identifying material type, quantity used and location.

An electronic copy of a Material List Template is in the Module B3 Resource Materials and a hard copy is included with the Training Handbook (Resource 14).

Related Legislation

The International Standard: ISO 11469 Plastics – Generic identification and marking of plastics products, specifies a system of uniform marking of products that have been fabricated from plastics materials. Provision for the process or processes to be used for marking is outside the scope of this standard.

The marking system is intended to help identify plastics products for subsequent decisions concerning handling, waste recovery or disposal.

Generic identification of the plastics is provided by the symbols and abbreviated terms given in ISO 1043, parts 1 to 4.

DIRECTIVE 2006/121/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 December 2006 amending Council Directive 67/548/EEC on the approximation of laws, regulations and administrative provisions relating to the classification, packaging and labelling of dangerous substances in order to adapt it to Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) and establishing a European Chemicals Agency.

According this Directive a Classification and Labelling Inventory will be developed based on the notifications by industry of dangerous substances and on the information on classification and labeling included in the REACH registration dossiers. Any manufacturer or importer who places on the market a dangerous substance requiring registration under REACH, must notify the Agency of the following:

a) identity of the manufacturer or importer;

b) identity of the substance(s);

c) hazard classification of the substance(s);

d) hazard label of the substance(s);

e) specific concentration limits.

The Agency will create and maintain this inventory in the form of a database, which shall be publicly accessible.

An electronic copy of the Directive relating to REACH is in the Module B3 Resource Materials (Resource 15).

The "Globally Harmonized System of Classification and Labelling of Chemicals (GHS)", addresses classification of chemicals by types of hazard and proposes harmonized hazard communication elements, including labels and safety data sheets. It aims at ensuring that information on physical hazards and toxicity from chemicals be available in order to enhance the protection of human health and the environment during the handling, transport and use of these chemicals. The GHS also provides a basis for harmonization of rules and regulations on chemicals at national, regional and worldwide level, an important factor also for trade facilitation.

An electronic copy of the Globally Harmonised System for Classification and Labelling of Chemicals, Annex 2 is in the Module B3 Resource Materials (Resource 16).

5.2.5 Heavy Metals and Flame Retardants

Criteria

a). Cadmium, lead, mercury, chromium 6+ or poly-brominated biphenyl (PCC) or poly-brominated diphenyl ether (PBDE) flame retardants, as listed in Article 4 (1) of Directive 2002/95/EC of the European Parliament and of the Council, shall not be used in the television unless the applications of those substances are listed in the Annex to that Directive as exempted from the requirements of Article 4(1) of that Directive or unless their maximum concentration value is equal to or lower than the threshold specified in that same Annex. Regarding the Annex, for PBBs and PBDEs, the maximum concentration value shall be < 0,1%.

b). Plastic parts shall not contain flame retardant substances, or preparations containing substances, that are assigned or may be assigned, at the time of application, any of the following risk phrases or combinations thereof:

- R40 (possible risk of cancer),
- R45 (may cause cancer),
- R46 (may cause heritable genetic damage),
- R50 (very toxic to aquatic organisms),
- R51 (toxic to aquatic organisms),
- R52 (harmful to aquatic organisms),
- R53 (may cause long term adverse effects in the aquatic environment),
- R60 (may impair fertility),
- R61 (may cause harm to the unborn child),
- R62 (possible risk of impaired fertility),
- R63 (possible risk of harm to the unborn child),

as defined in Directive 2006/121/EC. This requirement shall not apply to reactive flame retardants i.e. those which upon use change their properties (i.e. are actually not contained in the final product in a concentration > 0,1%) such that the

identified R-phrases above no longer apply.

Assessment and Verification

A certificate signed by the television manufacturer declaring compliance with these requirements shall be submitted to the awarding competent body. A declaration of compliance signed by the plastic and flame retardants suppliers and copies of relevant safety data sheets about materials and substances shall also be provided to the awarding competent body. All flame retardants used shall be clearly indicated.

An electronic copy of a Heavy Metals Declaration form is in the Module B3 Resource Materials and a hard copy is included with the Training Handbook (Resource 17).

Related Legislation

The directive RoHS: Directive 2002/95/EC of the European Parliament and of the Council of 27 January 2003 on the restriction of the use of certain hazardous substances in electrical and electronic equipment, is closely related with the criterion num. 5 (a). This paragraph sets that new electrical and electronic equipment put on the market does not contain lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls (PBB) or polybrominated diphenyl ethers (PBDE) from 1 July 2006.

The annex of the Directive sets several exceptions, for instance, mercury in compact fluorescent lamps not exceeding 5 mg per lamp, or lead in glass of cathode ray tubes, electronic components and fluorescent tubes.

An electronic copy of the Directive related to RoHS is in the Module B3 Resource Materials (Resource 18).

5.2.6 User Instructions and Label Information

Criteria

The television shall be sold with relevant user information that provides advice on its proper environmental use. The information shall be located in a single, easy-to-find place in the user instructions as well as on the manufacturer's website. The information will include in particular:

a. The television's power consumption in the various modes: on, off, passive standby, including information on energy saving possible in different modes.

b. The television's average annual energy consumption expressed in kWh, calculated on the basis of the on-mode power consumption, operating 4 hours and 365 days a year.

c. Information that energy efficiency cuts energy consumption and thus saves money by reductions electricity bills.

d. The following indications on how to reduce power consumption when the television is not being watched:

- turning the television off at its mains supply, or un-plugging it, will cut energy use to zero for all televisions, and is recommended when the television is not being used for a long time, e.g. when on holiday.

- using the hard off-switch will reduce energy use to near zero (where one is fitted).

- putting the television into standby mode, will reduce energy consumption, but will still draw some power.

- reducing the brightness of the screen will reduce energy use.

e. The position of the hard off-switch (where one is fitted).

f. Repair information regarding who is qualified to repair televisions, including contact details as appropriate.

g. End-of-life instructions for the proper disposal of televisions at civic amenity

sites or through retailer take-back schemes as applicable, which shall comply with Directive 2002/96/EC of the European Parliament and of the Council.

h. Information that the product has been awarded the flower with a brief explanation as to what this means together with an indication that more information on the Eco-label can be found at the website address http://www.Eco-label.eu.

Assessment and Verification

The applicant shall declare compliance of the product with these requirements and shall provide a copy of the instruction manual to the competent body assessing the application.

An electronic copy of an example of a User Manual is included in the Module B3 Resource Materials and a hard copy is included with the Training Handbook (Resource 19).

Related Legislation

Criterion 6.g. is closely related with the Directive WEEE, Directive 2002/96/EC of the European Parliament and of the Council of 27 January 2003 on waste electrical and electronic equipment (WEEE).

An electronic copy of the Directive related to WEEE is in the Module B3 Resource Materials (Resource 20).

The relevant articles are 5 and 6:

'Article 5. Separate collection

2. For WEEE from private households, Member States shall ensure that by the 13 August 2005:

(a) systems are set up allowing final holders and distributors to return such waste at least free of charge. Member States shall ensure the availability and accessibility of the necessary collection facilities, taking into account in particular the population density;

(b) when supplying a new product, distributors shall be responsible for ensuring that such waste can be returned to the distributor at least free of charge on a one-to-one basis as long as the equipment is of equivalent type and has fulfilled the same functions as the supplied equipment. Member States may depart from this provision provided they ensure that returning the WEEE is not thereby made more difficult for the final holder and provided that these systems remain free of charge for the final holder. Member States making use of this provision shall inform the Commission thereof;

(c) without prejudice to the provisions of (a) and (b), producers are allowed to set up and operate individual and/or collective take back systems for WEEE from private households provided that these are in line with the objectives of this Directive;'

'Article 6. Treatment

1. Member States shall ensure that producers or third parties acting on their behalf, in accordance with Community legislation, set up systems to provide for the treatment of WEEE using best available treatment, recovery and recycling techniques. The systems may be set up by producers individually and/or collectively. To ensure compliance with Article 4 of Directive 75/442/EEC, the treatment shall, as a minimum, include the removal of all fluids and a selective treatment in accordance with Annex II to this Directive.'

5.2.7 Information Appearing on the Eco-label

Criteria

Box 2 of the Eco-label shall include the following text:

- High energy efficiency,
- Reduced CO2 emissions,

- Designed to facilitate repair and recycling.

Assessment and Verification	The applicant shall declare the compliance of the product with this requirement, and shall provide a copy of the Eco-label as it appears on the packaging and/or product and/or accompanying documentation to the awarding competent body.

5.3 Making an Application

5.3.1 Exercise 1: Making an Application

Purpose

The participants will learn how to make an application in practice.

Introduction

The Company 'A' a multinational company certified with ISO 14001 and registered into the EMAS' register wants to apply the European Eco-label for several products.

This company is located in China and the main part of the production is done there, for that the products are labelled as 'Made in China'.

The products of the application are three television of the same family: TV!-32", TV242" and TV·-46". The three models have the same components; the only difference is the size.

TV1-32" = 32 inches

TV2-42" = 42 inches

TV3-46" = 46 inches

These televisions are LCD (Liquid Crystal Displays) with an IRD (Integrated digital Receiver/Decoder).

These products are sold around the world, also in all the European countries.

Table 1. List of the materials relevant for assess the fulfilment of the EU Eco-label criteria.

Supplier	Material
1	Fluorescent lamps
2	Plastic a[1]
3	Plastic b[1]
4	Plastic c[1]
5	Plastic d[1]
6	Plastic e[1]
7	Plastic f[1]

Plastics ≤ 25 gr. (weight) do not have to be included in the list.

Questions

1. Where to deliver the application?
2. Which reductions could the company apply for?
3. Documentation needed to justify the fulfilment of each criterion.
4. How to obtain this information.

Answer for Question 1

Answer for Question 2

Fee	Reduction	Company A
Application fee	≥ 25% SME[1]	
	≥ 25% Applicants from developing countries[1]	
Annual fee	= 15% EMAS / ISO 14001[2]	
	≥ 25% Applicants from developing countries[1]	
	≤ 25% First 3 applicants in a product group[1]	
	≤ 30% Other Eco-labels[1]	

Answers for Questions 3 and 4

Criteria No1. Energy Savings

Criteria No 2. Mercury content of Fluorescent Lamps

Criteria No 3. Lifetime extension

Criteria No 4. Design for Disassembly

Criteria No 5. Heavy Metals and Flame retardants

Criteria No 6. User instructions

Criteria No 7. Information appearing on the Eco-label

5.3.2 Exercise 2: Modifying a Certified Product

Purpose

Deliver an application to extent a license or modify a certified product. The Company 'A' have the products TV1-32", TV2-42" and TV3-46" certified with the European Eco-label and needs to do some modifications of these products and also wants to extent the license.

CASE 1: Enlargement of the licence

Introduction

Company A wants to apply the European Eco-label for a product that it is almost equal than some awarded products. The new product is called TV4-36".

The only difference between products TV1-32", TV2-42" and TV3-46" and the new model TV4-36" is the size of the television. The new model TV4-36" has 36 inches.

Questions

1. Which criteria company has to justify again.
2. Which documentation to deliver to justify the fulfilment of the new product.

Answer to Question 1

Answer to Question 2

CASE 2: Modification of awarded products

Introduction

Company A will use a new plastic: Plastic g, provided by Supplier 8, instead of the Plastic a.

Questions

1. Which criteria Company has to justify again
2. Which documentation to deliver to justify the fulfilment of the new product.

Answer to Question 1

Answer to Question 2

CASE 3: Change of name of an awarded product

Introduction The product TV1-32" will be also called and sold for marketing reasons as Television1-32".

Questions

1. Which criteria company has to justify again.
2. Which documentation to deliver to justify the fulfilment of the new product.

Answer to Question 1

Answer to Question 2

5.4 Success Stories

Introduction Currently there are three companies with Eco-labelled products:

SHARP ELECTRONICS (EUROPE)

SONY ESPAÑA, SA

SAMSUNG ELECTRONICS CO., LTD

SHARP Sharp was the first company with Eco-labelled products. The first award was in 2005.

Currently they have the following products awarded:

LCD colour televisions, family SH

LC13SH1E, LC15SH1E, LC20SH1E, LC15SH2E, LC20SH2E

LCD colour televisions, family AQUOS

LC20S4E, LC26GA6E, LC32GA6E, LC37GA6E, LC26P50E, LC32P50E, LC37P50E, LC32GA9E, LC37GA9E, LC32BV9E, LC37BV9E, LC26P55E, LC32P55E, LC37P55E, LC32GA8E, LC32BV8E, LC37GA8E, LC37BV8E, LC26SA1E, LC26SV1E, LC32SA1E, LC32SV1E, LC37SA1E, LC37SV1E, LC42SA1E,LC32RA1E, LC37RA1E, LC32SA1EA, LC32SV1EA, LC19A1EBK, LC19A1EWH, LC32D65E, LC32D653E, LC32D654E, LC37D65E, LC37D653E, LC37D654E, LC46D65E, LC46D653E, LC46D654E, LC52D65E, LC32DH65E, LC32DH65S, LC32DH66E, LC37DH65E, LC37DH65S, LC37DH66E, LC46DH65E, LC46DH65S, LC46DH66E, LC52DH65E, C52DH65S, LC52DH66E,LC32DH77E, LC32DH77S, LC32DH77V, LC42DH77E, LC42DH77S, LC42DH77V, LC46DH77E, LC46DH77S, LC46DH77V, LC52DH77E, LC52DH77S, LC52DH77V, LC32A47E, LC32DH57E, LC32DH57S, LC19S7E, LC26S7E, LC19SH7E, LC26SH7E LC32LE600E, LC32LE600S LC40LE600E, LC40LE600S, LC46LE600E, LC46LE600S, LC32LE700E, LC32LX700E, LC32LU700E, LC32LE700S, LC32LU700S, LC40LE700E, LC40LX700E, LC40LU700E, LC40LE700S, LC40LU700S, LC46LE700E, LC46LX700E, LC46LU700E, LC46LE700S, LC46LU700S, LC52LE700E, LC52LE700S

SONY Currently SONY has the following products awarded:

32E5500/5510/5520 series, 40E5500/5510/5520 series, 37P5500 series, 40P5500 series, 37S5500 series,

40S5500 series, 32V5500/5610 series, 37V5500/5610 series, 40V5500/5610 series, 46V5500/5610 series,

52V5500/5610 series, 32W5500/5710/5720/5730/5740 series, 37W5500/5710/5720/5730/5740 series,

40W5500/5710/5720/5730/5740 series, 46W5500/5710/5720/5730/5740 series, 40WE5 series,

46WE5 series, 52W5500 series, 32S5600/P5600/P3600 series, 37S5600/P5600 series, 40S5600/ P5600/

P3600 series, 40Z5500/5710 series, 46Z5500 series, 52Z5500 series

6 Module B4 Paper

6.1 Introduction

6.1.1 About this Module

Learning Objectives

Participants will:

- Learn about the EU Eco-label criteria for Paper products and verification method required
- Learn how to prepare and submit an application for an EU Eco-label
- Become familiar with the application process and how to obtain information about people and references to provide support
- Learn about how to work with the Eco-label and the paper industry in a practical way
- Learn about collaboration possibilities with existing eco-labelling schemes and national certification/audit agencies that can facilitate the application process
- Be able to adapt and replicate the training and provide technical and practical support to industry applicants.

Programme

- Introduction – Content/means of workshop, key documents and Eco-label website
- Application process for EU Eco-label
- Eco-label criteria

LUNCH

- An exercise regarding the application process
- Working with the paper industry and the Eco-label- A practical approach based on lessons learned – Targeting probable applicants
- Success stories presented by company representatives.

6.1.2 Relevant documents and information

Criteria Document 1

The criteria document in question is “The Copying and graphic paper criteria document “COMMISSION DECISION of 4 September 2002 establishing revised ecological criteria for the award of the Community eco-label to copying and graphic paper and amending Decision 1999/554/EC”.

An electronic copy of the 2002 Criteria Document is in the Module B4 Resource Materials (Resource 1) and a hard copy is included with the Training Handbook.

The document exists in all EU languages: eg. Portuguese, Spanish, and English and is to be found at: http://eurlex.europa.eu

Every criteria document has a certain “life time”. The article 5 explains from and till when the criteria document is valid. There are always an overlap between old versions and new versions of criteria documents to secure, that licence keepers have a certain time to renew their licence according to the new version of the criteria document before their licence expires.

When the new version of the criteria document is not in place before the old version of the criteria document expires the old version of the criteria document will be prolonged – see e.g. the paper criteria document which was prolonged in 2008.

In article 5 the “life-time” of the criteria document is described. The criteria document version from 2002 is thus valid from 1 September 2002 until 31 August 2007.

Since the new version of the criteria document was not ready before 31 August 2007, the 2002-version was prolonged until 31 May 2010.

Structure of the

Criteria documents for the Flower consist of two main parts: The Commission decision

Criteria Document

and the Annex. In the Commission decision the product group definition (article 2) and the "life time" of the criteria document (article 5) are given. The Annex starts with the aims of the criteria and some general statement about the assessment and verification requirement, but is mainly the actual criteria which the product has to fulfill to get the eco-label.

All criteria consist of 2 parts: 1) the actual criteria and 2) assessments and verification

Criteria Document 2

The criteria for Copying and Graphic paper are under revision at the moment. The Italian Competent Body is leading the process.

The latest documents (draft for new criteria and draft of background document) are dated the 31. July 2009. These documents will be discussed at the 3rd and last Ad Hoc Working Group) AHWG meeting (Nov 09).

The Commission is expecting to vote on the documents in April 2010.

Expected changes in the new Criteria are:

- Phosphorus is included
- Certified fibres 50%
- Fitness for use
- General lowering of the permitted limits

Users Manual and Application Pack

The purpose of the User Manual – or Application Pack, as it is also called – is to help the applicants with easy ways to document what they need, the give an overview of which sub-supplier needs to document what criteria, and the secure that all relevant documentation is gathered for each relevant part of the production chain.

An electronic copy of the User Manual is in the Module B4 Resource Materials (Resource 2) and a hard copy is included with the Training Handbook.

The manual consists of 5 parts:

Introduction: is a short review of which products that can be awarded the Eco-label and how the application in order to get Eco-labelled copying and graphic paper shall be made.

Product group definition: is a general application form common for all product groups under the EU Eco-labelling scheme.

Who can apply for the label is a description of responsibility of the applicant and general remarks of the assessment and verification part of the criteria document. This part also includes general information on costs and the procedure for the assessment of the application.

In the part Ecological Criteria a more comprehensive explanation of each of the criteria is given.

Finally 4 appendixes are given to help the applicant making a complete application. This includes among other things declarations to be filed out by the chemical suppliers.

Background Document

The Background report for the 2002 version of the document is available at the Commission homepage.

A background report for the new criteria is available on the Commission web page.

In general a background report describes the (technical) background for the criteria or the changes made in the criteria document during the revision, which includes the results of the revision work in the form of the new criteria.

The background report (draft) is structured in the following chapters:

- Product group definition
- Current criteria and suggested changes
- New criteria
- Market update
- Textile criteria in other eco-labelling schemes
- Marketing and communication.

How to Find Documents and Relevant Information

http://ec.europa.eu/environment/Eco-label/index_en.htm.

At this website you can find:

Criteria documents,

User Manuals

Competent Bodies

News

Links – e.g. to other Eco-labels

http://www.eco-label.com/default.htm

At this website you can find:

Licence holders

Potential customers

6.2 Introduction to the EU Eco-label process

6.2.1 Costs

Getting started

	Minimum	Maximum	Reductions
Application fee covers the costs of processing the application.	EUR 300	EUR 1300	25% for SMEs and applicants from developing countries
	Minimum	**Maximum**	**Reductions**
Annual fee for the use of the label = 0.15% of annual volume of sales of the product within the Community	EUR 500per product group per applicant	EUR 25000per product group per applicant.	25% for SMEs and applicants from developing countries15% for companies registered under EMAS or certified under ISO 14001 Other reductions possible, please contact your Competent Body for further details.

Every European or non European company producing or selling products that enter in one of the product groups covered by the EU Eco-label scheme.

Applications for the Eco-label may be submitted by manufacturers, importers, services providers, traders and retailers. Traders and retailers may submit applications in respect

of products placed on the traders market under their own brand names.

If a product originates in a single Member State the application shall be presented in this Member State.

If a product originates in the same form in several Member States the application may presented in one of those Member States.

If a product originates outside the Community the application may be presented in any of the Member States in which the product is to be or has been placed on the market.

Always check if the product falls under the product group definition

6.2.2 The Process Steps

Step 1:

Select the Eco-label product group for which you want to apply

Consult the product groups and criteria available here.

Contact a national Competent Body

- The Competent Body is an independent and neutral organization responsible for implementing the Community Eco-label award scheme at national level.
- The Competent Body will analyse your needs and will give you technical support.

Case One: Your product is made in one of the EU Member States:

- Contact the Competent Body of the country in which the product is made.

Case Two: Your product is made outside Europe:

- Contact the Competent Body in the country / one of the countries where your product is sold.

Step 2a:

NB: Please note that first-hand information and early contact with your Competent Body is crucial and may pay off e.g. obtaining marketing support, reductions in fees, etc.

Consult your Competent Body to request the necessary documents and application forms. Competent Bodies will inform you which test results must be provided and how the testing should be carried out. The EU Eco-label checklist may help you to manage your dossier.

The applicant must compile documentation for all relevant criteria for the product. For this purpose the User Manual contains pre-made forms of declarations and lists stating the information needed for the application. Two different levels for declarations are often used; declarations from the applicant/producer and declarations from the sub suppliers.

In case where the sub supplier must provide information which he wants to be held confidential to the applicant it can be sent directly to the Competent Body, which is assigned to treat information confidential.

All relevant documentation has to be sent to the Competent Body together with the application. A copy of all material must be kept at the applicant.

The fee has to be paid (documentation for paid fee can also be practical to add to the application).

Step 2b:

The laboratory has to be certified under ISO 17025 or equivalent. For more information on the test method please contact the Competent Body.

It has to be accepted by the Competent Body.

The applicant must communicate all the required information on the laboratory to the Competent Body.

List of certified laboratories here: http://ec.europa.eu/environment/Eco-label/Eco-labelled_products/pdf/get_products_tested_en.pdf

Choice of test method

- The test method indicated in the criteria document and User Manual should in principle be used for testing.
- Test methods different from those reported into the criteria could be accepted only if it can be substantiated that the test method is equivalent with the required method. This includes as a minimum the same level of sensitivity of the method and that the test technically seen is carried out at the same stage in the life cycle and for exactly the same parameters as required in the criteria document.
- For those criteria where no specific test method is required the applicant must give information on the principles and sensitivity of the test method used.

Test periods and test frequency

- For a number of criteria only one test in relation to the application is required. However, it is the responsibility of the contract holder that the products are in continuous compliance with the Eco-labelling criteria. As the necessary test frequency depends on the way of production it must be explained how often samples for test are taken.
- For criteria where the annual average is not allowed to pass a given threshold, the annual average should as a minimum be based on three measurements.
- If more than one sample is taken during the same campaign, the average within each campaign can be used as one of the three samples that have to be taken during the year.

Step 2c: Ecological and performance criteria for your products will be assessed, according to the documentation sent.

Since it is most unlikely that everything is perfect, there must be expected some communication forth and back between the Competent Body and the applicant, where the applicant will have to answer questions, provide more or different documentation.

A visit of your manufacturing facility may be organised in order to ensure compliance with the criteria.

When all requirements have been met, the Competent Body notifies the application in the European Commission who registers the contract.

Step 3a: If your product meets the requirements the Competent Body will conclude a contract with you and award you the EU Eco-label. Then you can use the Eco-label logo on your products.

Depending on the size of your company and your country, you need to pay a fee. This covers marketing activities undertaken by the Competent Body as well as the right to use the Eco-label on your products and for advertisement. (this text is from the EU Eco-label Website, many countries wants the fee to be paid before the start to handle the application)

Step 3b: Factory inspections and product tests may be carried out by the Competent Body at any time to ensure environmental excellence of Eco-labelled products to the consumers.

It is the responsibility of the contract holder that the products are in continuous compliance with the Eco-label criteria. As the necessary test frequency depends on the nature of the production, the Competent Body will explain how often test samples are to be taken.

The contract holder or his supplier is responsible for keeping a journal on the test results and the relevant documentation. This documentation must be available at any time.

NB: If data shows that the product during the validity period no longer complies with the criteria, this must be reported to the Competent Body immediately together with a statement for the reasons for the non-compliance. The Competent Body will in each individual case decide the consequences of the non-compliance, e.g. a demand for additional measurements, suspension of the label etc.

Summary of the Application Process

Through the application process it is essential to keep a systematic approach and to use the User Manual.

First the product in question has to be identified. For a paper it would mean to identify the paper mill, product name and grammage and the pulps and chemical used in the product. To start keep it simple – a licence (recipe) can always be changes.

Contact a Competent Body. Personal contact is of great importance to keep the application process simple and correct as possible from the beginning.

Make a flow chart to identify all relevant suppliers and identify the information they have to provide.

When collecting the data make sure to use the UM. This will keep the work load down and will ensure that all the relevant documentation is gathered. When receiving the documentation check if the documentation is correct and adequate. If you don´t the Competent Body will and this will prolong the application process!

Make the calculation and make sure that all criteria are fulfilled. Again if you don´t the Competent Body will and this will prolong the application process!

Send the application. If you receive complementary questions make sure you understand what information is needed. If unclear ask the Competent Body to be more specific.

6.2.3 Other Matters

Application Contract:

At application the applicant must report the trade names and identification or reference numbers of the products in question. All chemicals used for the Eco-labelled product must be reported in the application, as well. When the application has been processed by the Competent Body, a contract specifying range of products and chemicals permitted will be granted.

It is recommended at the time of application to limit the number of chemicals and suppliers as far as possible, as this will ease the application procedure for the applicant considerably.

In case the contract holder wants to extend his range of products the following conditions apply:

Extension with new identification/reference numbers, which do not affect the criteria, can be done without informing the Competent Body. However if new types of products or new brand names are included in the contract the Competent Body must be informed. The contract holder must keep the identification/reference numbers, which are included, in the dossier. The dossier must be available for the Competent Body on request.

Extension of a licence with new pulps or chemicals, as far as these are affected by the criteria, must be approved by the Competent Body prior to use. This must be done by informing the Competent Body about the chemicals in question together with the necessary documentation for these. Besides an updated ‘List of Chemicals’ of “list of sub suppliers and/or new calculations must be provided.

Green

Enhance the value of the label by promoting your product via advertising and

Marketing communication initiatives.

Ask the Competent Body for the available supporting measures. In addition to the activities of the Competent Bodies, the European Commission also supports and promotes the scheme on the European level.

Keep informed on the Flower with the news, promote your products on the Green Store and consult the Marketing guide to discover all opportunities you have to promote your products through the Flower.

6.3 The EU Label Criteria for Paper

6.3.1 Product Group

Definition The product group definition tells which products are included and thus can get the Flower and is described in article 2:

The product group 'copying and graphic paper' shall comprise sheets or reels of unprinted paper which are used for printing or copying or writing or drawing.

Newsprint, thermally sensitive paper and carbonless paper are not included in the product group.

6.3.2 Emissions to Water and Air

Criterion 1a COD, Sulphur and NO_x

The Criteria For each of these parameters, the emissions to air and/or water from the pulp and the paper production shall be expressed in terms of points (PCOD, PS, PNOx) as detailed below.

None of the individual points PCOD, PS, or PNOx shall exceed 1,5.

The total number of points (Ptotal = PCOD+ PS+ PNOx) shall not exceed 3,0.

The Calculations The calculation of PCOD shall be made as follows (the calculations of PS and PNOx shall be made in exactly the same manner).

Calculation for pulp production: For each pulp i used, the related COD emissions (CODpulp, i expressed in kg/air dried tonne — ADT), shall be divided by the reference value for that pulp type (CODreference, pulp) given in the table below. These quotients shall be weighted according to the proportion of each pulp used (pi with respect to moist paper), and summed together to give the number of points for the pulp production (PCOD, pulp).

Thus:

PCOD, pulp= Σ (pi× CODpulp, i/CODreference, pulp)

Calculation for paper production: The number of points for the paper production (PCOD, paper) shall be calculated by dividing the related COD emissions (CODpaper) by the reference value for paper (CODreference, paper) given in the table below. Thus:

PCOD, paper = CODpaper/CODreference, paper

Overall calculation of points PCOD:

An overall reference value for pulp weighted over the different pulps used (CODweighted reference, pulp) shall be calculated as follows:

CODweighted reference, pulp = Σ (pi× CODreference, pulp) Emissions (kg/ADT) Pulp grade/paper

Finally, the points for pulp and paper production shall be combined to give the overall number of points (PCOD) as follows:

PCOD = PCOD, pulp × CODweighted reference, pulp/(CODweighted reference, pulp + CODreference, paper) +PCOD, paper × CODreference, paper/ (CODweighted reference, pulp + CODreference, paper)

Table of reference values for emissions from different pulp types and from paper production.

Assessment and Verification

The applicant shall provide detailed calculations showing compliance with this criterion, together with related supporting documentation which shall include test reports using the following test methods:

COD: ISO 6060; NOx: ISO 11564; S(oxid.): EPA no.8; S(red.): EPA no 16A; S content in oil: ISO 8754:1995; S content in coal: ISO 351.

The supporting documentation shall include an indication of the measurement frequency and the calculation of the points for COD, S and NOx. It shall include all emissions of S and NOx which occur during the production of pulp and paper, including steam generated outside the production site, except those emissions related to the production of electricity. Measurements shall include recovery boilers, lime kilns, steam boilers and destructor furnaces for strong smelling gases. Diffuse emissions shall be taken into account. Reported emission values for S to air shall include both oxidised and reduced S emissions (dimethyl sulphide, methyl mercaptan, hydrogen sulphide and the like). The S emissions related to the heat energy generation from oil, coal and other external fuels with known S content may be calculated instead of measured, and shall be taken into account.

Measurements of emissions to water shall be taken on unfiltered and unsettled samples either after treatment at the plant or after treatment by a public treatment plant. The period for the measurements shall be based on the production during 12 months. In case of a new or a rebuilt production plant, the measurements shall be based on at least 45 subsequent days of stable running of the plant. The measurement shall be representative for the respective campaign.

Criterion 1b: AOX

The Criteria

The AOX emissions from the production of each pulp used shall not exceed 0,25 kg/ADT.

Assessment and Verification

The applicant shall provide test reports using the following test method: AOX ISO 9562 (1989). The supporting documentation shall include an indication of the measurement frequency. AOX shall only be measured in processes where chlorine compounds are used for the bleaching of the pulp. AOX need not be measured in the effluent from non-integrated paper production or in the effluents from pulp production without bleaching or where the bleaching is performed with chlorine-free substances.

Criteriobn 1c: CO_2

The Criteria

The emissions of carbon dioxide from non-renewable sources shall not exceed 1 000 kg per tonne of paper produced, including emissions from the production of electricity (whether on-site or off-site). For non-integrated mills (where all pulps used are purchased market pulps) the emissions shall not exceed 1 100 kg per tonne. The emissions shall be calculated as the sum of the emissions from the pulp and paper production.

Assessment and Verification

The applicant shall provide detailed calculations showing compliance with this criterion, together with related supporting documentation.

The applicant shall provide data on the air emissions of carbon dioxide. This shall include all sources of non-renewable fuels during the production of pulp and paper, including the emissions from the production of electricity (whether on-site or off-site).

Emission factors witch shall be used in the calculation of the CO2 emissions from fuels is listed in the criteria document.

For grid electricity, the value quoted in the table above (the European average) shall be used unless the applicant presents documentation establishing the average value for their supplier(s) of electricity, in which case the applicant may use this value instead of the value quoted in the table.

The period for the calculations or mass balances shall be based on the production during 12 months. In case of a new or a rebuilt production plant, the calculations shall be based on at least 45 subsequent days of stable running of the plant. The calculations shall be representative for the respective campaign.

6.3.3 Energy Use

Criterion 2a: Electricity

The Criteria

The electricity consumption related to the pulp and the paper production shall be expressed in terms of points (PE) as detailed below.

The number of points, PE, shall be less than or equal to 1,5.

The Calculation

The calculation of PE shall be made as follows:

Calculation for pulp production: For each pulp used, the related electricity consumption (Epulp, expressed in kWh/ADT) shall be calculated.

Epulp = Internally produced electricity + purchased electricity – sold electricity.

This value shall be divided by the reference value for that pulp type (Ereference, pulp) given in the criteria document. These quotients shall be weighted according to the proportion of each pulp used (with respect to moist paper) and summed together to give the number of points for the electricity consumption in the pulp production (PE, pulp).

Calculation for paper production: Similarly, the electricity consumption related to the paper production (Epaper) shall be calculated and divided by the reference value for that paper type (Ereference, paper) given in the criteria document as follows:

Epaper = Internally produced electricity + purchased electricity – sold electricity

Finally, the points for pulp and paper production shall be combined to give the overall number of points (PE) as follows:

PE = PE, pulp × Eweighted reference, pulp/(Eweighted reference, pulp + Ereference, paper) + PE, paper × Ereference, paper/(Eweighted reference, pulp +

Ereference, paper)

Criterion 2b: Fuel (heat)

The Criteria

The fuel consumption related to the pulp and the paper production shall be expressed in terms of points (PF) as detailed below.

The number of points, PF, shall be less than or equal to 1,5.

The Calculation

The calculation of PF shall be made as follows.

Calculation for pulp production: For each pulp i used, the related fuel consumption (Fpulp, i expressed in kWh/ADT)shall be calculated as follows:

Fpulp, i = Internally produced fuel + purchased fuel – sold fuel – 1,25 × internally produced electricity

Note: Fpulp, i (and its contribution to PF, pulp) need not be calculated for mechanical pulp unless its market air dried mechanical pulp containing at least 90 % dry matter.

Fpulp, i shall be divided by the reference value for the respective pulp type (Freference, pulp) given in the criteria document. These quotients shall be weighted according to the proportion of each pulp used (pi with respect to moist paper) and summed together to give the number of points for the fuel in the pulp production (PF, pulp). Thus:

PF, pulp= Σ (pi× Fpulp, i/Freference, pulp)

Calculation for paper production: Similarly the fuel consumption related to the paper production (Fpaper, expressed in kWh/ADT), shall be calculated as follows:

Fpaper = Internally produced fuel + purchased fuel – sold fuel – 1,25 × internally produced electricity

PF, paper = Fpaper/Freference, paper

Overall calculation of points PF: An overall weighted reference value for pulp (Fweighted reference, pulp), shall be calculated as follows:

Fweighted reference, pulp = Σ (pi× Freference, pulp)

Finally, the points for pulp and paper production shall be combined to give the overall number of points (PF) as follows:

PF = PF, pulp × Fweighted reference, pulp/(Fweighted reference, pulp + Freference, paper) + PF, paper × Freference, paper/(Fweighted reference, pulp + Freference, paper)

Assessment and Verification (for both (a) and (b))

The applicant shall provide detailed calculations showing compliance with this criterion, together with all related supporting documentation. Reported details should therefore include the total electricity and fuel consumption.

The applicant shall calculate all energy inputs, divided into heat/fuels and electricity used during the production of pulp and paper, including the energy used in the de-inking of waste papers for the production of recycled paper.

Energy used in the transport of raw materials, as well as conversion and packaging, is not included in the energy consumption calculations.

Total heat energy includes all purchased fuels. It also includes heat energy recovered by incinerating liquors and wastes from on-site processes (e.g. wood waste, sawdust, liquors, waste paper, paper broke), as well as heat recovered from the internal generation of electricity — however, the applicant need only count 80 % of the heat energy from such sources when calculating the total heat energy.

Electric energy means net imported electricity coming from the grid and internal generation of electricity measured as electric power. Electricity used for wastewater treatment need not be included. Where steam is generated using electricity as the heat source, the heat value of the steam shall be calculated, then divided by 0,8 and added to the total fuel consumption

6.3.4 Fibres

The Criteria

Fibres may be wood fibres, or recycled fibres from recovered paper, or other cellulose fibres. Fibres from paper mill broke shall not be considered as recycled fibres.

At least 10 % of virgin wood fibres from forests shall come from forests that are certified as being managed so as to implement the principles and measures aimed at ensuring sustainable forest management.

The remaining virgin wood fibres from forests shall come from forests that are managed so as to implement the principles and measures aimed at ensuring sustainable forest management. The origin of all virgin fibres used shall be indicated.

In Europe, the principles and measures referred to above shall at least correspond to those of the Pan-European Operational Level Guidelines for Sustainable Forest Management, as endorsed by the Lisbon Ministerial Conference on the Protection of Forests in Europe (2 to 4 June 1998). Outside Europe they shall at least correspond to the UNCED Forest Principles (Rio de Janeiro, June 1992) and, where applicable, to the criteria or guidelines for sustainable forest management as adopted under the respective international and regional initiatives (ITTO, Montreal Process, Tarapoto Process, UNEP/FAO Dry-Zone Africa Initiative).

Assessment and Verification

The applicant shall indicate the types, quantities and origins of fibres used in the pulp and the paper production. The origins of virgin fibres shall be indicated with sufficient precision to allow, where appropriate, checks to be carried out that the virgin fibres are from sustainably managed forests. Where virgin fibres from forests are used, the applicant shall provide appropriate certificate(s) together with supporting documentation showing that the certification scheme correctly assesses the abovementioned principles and measures of sustainable forest management. For those virgin wood fibres from forests that are not certified as being from sustainably managed forests, the applicant shall provide the appropriate declarations, charter, code of conduct or statement, verifying that the above requirements are met.

6.3.5 Hazardous Chemical Substances

Chemical List

General Requirement

The applicant shall supply a list of the chemical products used in the pulp and paper production, together with appropriate documentation (such as MSDSs). This list shall include the quantity, function and suppliers of all process chemicals used.

Criterion 4a: Chlorine

The Criteria

Chlorine gas shall not be used as a bleaching agent. This requirement does not apply to chlorine gas related to the production and use of chlorine dioxide.

Assessment and

The applicant shall provide a declaration from the pulp producer(s) that chlorine gas has not been used as a bleaching agent.

Verification	Note: while this requirement also applies to the bleaching of recycled fibres, it is accepted that the fibres in their previous life-cycle may have been bleached with chlorine gas

Criterion 4b: APEO's

The Criteria	Alkylphenol ethoxylates or other alkylphenol derivatives shall not be added to cleaning chemicals, de-inking chemicals, foam inhibitors, dispersants or coatings. Alkylphenol derivatives are defined as substances that upon degradation produce alkyl phenols.
Assessment and Verification	The applicant shall provide a declaration(s) from their chemical supplier(s) that alkylphenol ethoxylates or other alkylphenol derivatives have not been added to these products.

Criterion 4c: Residual Monomers

The Criteria

The total quantity of residual monomers (excluding acrylamide) that are assigned or may be assigned any of the following risk phrases (or combinations thereof):

- R45 (may cause cancer)
- R46 (may cause heritable genetic damage)
- R49 (may cause cancer by inhalation)
- R50/53 (very toxic to aquatic organisms and may cause long-term adverse effects in the aquatic environment)
- R51/53 (toxic to aquatic organisms and may cause long-term adverse effects in the aquatic environment)
- R52/53 (harmful to aquatic organisms and may cause long-term adverse effects in the aquatic environment)
- R60 (may impair fertility)
- R61 (may cause harm to the unborn child)

as defined in Council Directive 67/548/EEC of 27 June 1967 on the approximation of laws, regulations and administrative provisions relating to the classification, packaging and labelling of dangerous substances (1) and its subsequent amendments, in ***coatings, retention aids, strengtheners, water repellents or chemicals used in internal and external water treatment*** shall not exceed 100 ppm (calculated on the basis of their solid content).

Acrylamide shall not be present in coatings, retention aids, strengtheners, water repellents or chemicals used in internal and external water treatment in concentrations higher than 1 000 ppm (calculated on the basis of their solid content).

The Competent Body may exempt the applicant from these requirements in relation to chemicals used in external water treatment.

Assessment and Verification	The applicant shall provide a declaration of compliance with this criterion, together with appropriate documentation (such as MSDSs)

Criterion 4d: Surfactants in De-inking

The Criteria

Where surfactants are used in quantities of at least 100 g/ADT (summed over all the surfactants used in the all the different formulations used in de-inking return fibres), each surfactant shall be readily biodegradable. Where such surfactants are used in quantities of less than 100 g/ADT, each surfactant shall be either readily biodegradable or ultimately biodegradable (see test methods and pass levels below).

Assessment and Verification

The applicant shall provide a declaration of compliance with this criterion together with the relevant material safety data sheets or test reports for each surfactant which shall indicate the test method, threshold and conclusion stated, using one of the following test methods and pass levels: for ready biodegradability OECD 301 A-F (or equivalent ISO standards), with a percentage degradation within 28 days of at least 70 % for 301 A and E, and of at least 60 % for 301 B, C, D and F; for ultimate biodegradability OECD 302 A-C (or equivalent ISO standards), with a percentage degradation (including adsorption) within 28 days of at least 70 % for 302 A and B, and of at least 60 % for 302 C.

Criterion 4e: Biocides

The Criteria

The active components in biocides or biostatic agents used to counter slime-forming organisms in circulation water systems containing fibres shall not be potentially bio-accumulative.

Assessment and Verification

The applicant shall provide a declaration of compliance with this criterion together with the relevant material safety data sheet or test report which shall indicate the test method, threshold and conclusion stated, using the following test methods: OECD 107, 117 or 305 A-E.

Criterion 4f: Azo Dyes

The Criteria

Azo dyes: No azo dyes shall be used that may cleave to any of the following aromatic amines:

- 4-aminobiphenyl (92-67-1)
- benzidine (92-87-5)
- 4-chloro-o-toluidine (95-69-2)
- 2-naphthylamine (91-59-8)
- o-aminoazotoluene (97-56-3)
- 2-amino-4-nitrotoluene (99-55-8)
- 4-chloroaniline (106-47-8)
- 2,4-diaminoanisol (615-05-4)
- 4,4-diaminodiphenylmethane (101-77-9)
- 3,3-dichlorobenzidine (91-94-1)
- (1) OJ 196, 16.8.1967, p. 1.
- L 237/14 EN Official Journal of the European Communities 5.9.2002
- 3,3-dimethoxybenzidine (119-90-4)
- 3,3-dimethylbenzidine (119-93-7)
- 3,3-dimethyl-4,4-diaminodiphenylmethane (838-88-0)

- p-cresidine (120-71-8)
- 4,4-methylene-bis-(2-chloroaniline) (101-14-4)
- 4,4-oxydianiline (101-80-4)
- 4,4-thiodianiline (139-65-1)
- o-toluidine (95-53-4)
- 2,4-diaminotoluene (95-80-7)
- 2,4,5-trimethylaniline (137-17-7)
- o-anisidine (90-04-0)
- 4-aminoazobenzene (60-09-3)

Assessment and Verification The applicant shall provide a declaration of compliance with this criterion.

Criterion 4g: Dye Stuffs

The Criteria No commercial dye formulation shall be used on either pulp or paper that is assigned or may be assigned at the time of application any of the following risk phrases (or combinations thereof):

- R50 (very toxic to aquatic organisms),
- R51 (toxic to aquatic organisms),
- R52 (harmful to aquatic organisms),
- R53 (may cause long-term adverse effects in the aquatic environment),

according to Directive 1999/45/EC of the European Parliament and of the Council of 31 May 1999 concerning the approximation of the laws, regulations and administrative provisions of the Member States relating to the classification, packaging and labelling of dangerous preparations (1), and its subsequent amendments.

No commercial dye formulation shall be used on either pulp or paper that contains more than a total of 2 % by weight of substances that are assigned or may be assigned at the time of application any of the above risk phrases (or combinations thereof) according to Directive 67/548/EEC and its subsequent amendments.

This criterion does not apply to formulations where the classification is solely due to the presence of dyeing component(s) with a degree of fixation of at least 98 %. The degree of fixation is taken as the total dye retention on the fibres in the process.

Assessment and Verification The applicant shall provide a declaration of compliance with this criterion together with appropriate supporting documentation such as the relevant Material Safety Data Sheets.

Criterion 4h: Metal Complex Dyes

The Criteria Dyes or pigments shall not be used that are based on lead, copper, chromium, nickel or aluminium. Copper phthalocyanine dyes or pigments may, however, be used.

Assessment and Verification	The applicant shall provide a declaration of compliance.

Criterion 4i: Ionic Impurities in Dyes

The Criteria	The levels of ionic impurities in the dye stuffs used shall not exceed the following: Ag 100 ppm; As 50 ppm; Ba 100 ppm; Cd 20 ppm; Co 500 ppm; Cr 100 ppm; Cu 250 ppm; Fe 2 500 ppm; Hg 4 ppm; Mn 1 000 ppm; Ni 200 ppm; Pb 100 ppm; Se 20 ppm; Sb 50 ppm; Sn 250 ppm; Zn 1 500 ppm.
Assessment and Verification	The applicant shall provide a declaration of compliance.

6.3.6 Waste Management

The Criteria	All pulp and paper production sites shall have a system for handling waste (as defined by the relevant regulatory authorities of the pulp and paper production sites in question) and residual products arising from the production of the eco-labelled product. The system shall be documented or explained in the application and include information on at least the following points: • procedures for separating and using recyclable materials from the waste stream, • procedures for recovering materials for other uses, such as incineration for raising process steam or heating, or agricultural use • procedures for handling hazardous waste (as defined by the relevant regulatory authorities of the pulp and paper production sites in question).
Assessment and Verification	The applicant shall provide a description of the waste management for the sites concerned and a declaration of compliance with the criterion.

6.3.7 Fitness for Use and Information

Fit for Use

The Criteria	The product shall be fit for use.
Assessment and Verification	The applicant shall provide appropriate documentation and/or test results.

Information on Packaging

The Criteria	The product shall bear the following text (or equivalent text) on the primary and secondary packaging: • ‘This product qualifies for the Flower because it meets requirements that,

amongst others, limit emissions to water (COD, AOX), to air (S, NOX, CO2), and limits the use of energy, fossil fuels and hazardous substances.'

- 'For more information on the Flower, please visit the web-site: http://europa.eu.int/Eco-label'
- 'Please collect used paper for recycling'.

In addition, the manufacturer may also provide a statement indicating the minimum percentage of recycled fibres.

Assessment and Verification The applicant shall provide a sample of the product packaging and of the information supplied with the product, together with a declaration of compliance with this criterion.

Information appearing on the eco-label

The Criteria Box 2 of the eco-label shall contain the following text:

- 'low air and water pollution
- low energy use
- harmful substances restricted'.

Assessment and Verification The applicant shall provide a sample of the product packaging showing the label, together with a declaration of compliance with this criterion.

New Criteria Draft

Expected Changes The expected changes compared to the current document are:

ARTICLE 2

1. The product group "copying and graphic paper" shall comprise unprinted paper for writing, printing and copying purposes sold in sheets or reels;

2. Finished paper products, such as writing pads, drawing books, calendars, manuals, sacks and bags are not included in the product group.

3. Newsprint, monoglazed, thermally sensitive paper, photographic and carbonless paper, packaging and wrapping papers and products containing fragrances are not included in the product group.

Criterion 1a: phosphorus is included

Criteria on 3 Fibres: At least 50% of the total amount of virgin fibers **used in the product** shall however originate from sustainably managed forests which have been certified by independent third party forest certification Schemes

Fitness for use: the a*ssessment and verification documentation has increased since* the applicant shall provide test results emitted by an accredited laboratory, in compliance with the scope of the criteria. Test methods must follow one of the following norms:

- Copying Papers: EN 12281 – "Printing and business paper - Requirements for copy paper for dry toner imaging processes"
- Continuous papers: EN 12858 – "Paper - Printing and business paper - Requirements for continuous stationery"

Additionally, the permanent paper designed for documents must meet the requirements for permanence of the norm EN ISO 9706 – "Information and documentation - Paper for documents - Requirements for permanence"

Also a general lowering of the emissions and reference values has been introduced in various criteria.

An important document in the revision process has been the BAT report regarding the paper and pulp industry (IPPC Directive). Only the 2001 data is available at the moment. Hopefully new data will be published in 2009 and that can influence the emission and reference values.

6.4 Making an Application for the Flower Eco-label: Exercise

Introduction

This exercise will introduce you to a typical situation for a paper manufacturer who wants to apply for a Flower label. The example is theoretical but the emissions and chemicals are taken from real licence holders. The information is not complete so one of the aims is to identify information still needed. If you need to make assumptions make sure to note these so they will be clear for the Competent Body who will receive the application.

The Paper Mill

A coated paper product that will be Eco-labelled is produced at a paper mill integrated with a mechanical pulp production plant. The paper product contains also 40% purchased market pulp from Brazil.

The paper product contains:

- 15.5% filler and coatings
- 40% TMP, ADT
- 40% Market Kraft Pulp, ADT (90% dry matter content) (name of the pulp is Pure pulp from)
- The moisture content of the paper is 5%

Chemicals Used in the Paper Mill

Name of the chemical	Function	Supplier/ Importer	Amount used (kg/tonne)	Site/place in the mill	Safety data sheet (X)
Harmilithe F2 HA	Calcium Carbonate slurry	SA Omya	1,39	Fresh Water Treatment	
Hi-Phase 435	Internal sizing agent	Hercules	3,00	PM1	
Nalco 74559	Retention aid	Nalco	0,75	PM1	
Afranil MG	Antifoam	BASF	0,25	PM1	
Amylofax PW	Internal starch	Avebe	0,55	PM1	
Hedifix m/50	Anionic Trash Catcher	Kolb	1,25	PM1	
Cartasol Orange K3GL	Dye	Clariant	1,26	Dying	
Cartasol Red 2GFN	Dye	Clariant	2,0	Dying	

Cartasol Red 4BF	Dye	Clariant	1,95	Dying	

Emissions from the Paper Mill

	Value
NOx kg/tonne paper	0,8
S tonne Kg/ tonne paper	0,3
COD	4,0
AOX Kg / tonne paper	0,15

Energy Used in the Paper Mill

	Kwh/t paper
Coal	1592
Electricity	490

Pure Pulp (kraft pulp)

Chemicals used in the Pulp Production

Name of the chemical	Function	Supplier/ Importer	Amount used (kg/tonne	Site/place in the mill	Safety data sheet (X)
NaSH	Defoamer	SA Omya	0,60		
Trisodiumphosfate	Fresh water conditioner	Hercules	0,55	Fresh Water Intake	
Formic acid	Cleaning	Nalco		PM	
Hydrogen peroxide 60%	Bleaching	BASF	7,95	Bleaching	
Bulab 7024	Bleaching	Avebe	1,65	Bleaching	
Losil 37	Defoamer	SA Omya	0,26	PM	
Butrol 1130	Biocide	Hercules	1,12	PM	
Labufloc C300	Floccilating agent,	Nalco	3,25	Waste water treatment	

Emissions from the Pulp Production

	Value
NOx Kg/ADT	1,4
S Kg/ADT	0,5
AOX Kg/ADT	0,21
COD Kg/ADT	24

Energy used in the Pulp Production

	Kwh/ADT
Natural gas	1532
Electricity	521

Questions

You are helping a Brazilian paper manufacture to get the Flower label to one a range of coated paper qualities.

1. Make a plan of action for the application process – how will you recommend the company to go forward

2. Al lot of information is already reported in the company's EMAS reporting:
   - Which criteria can be documented using the information available
   - Are the paper qualities fulfilling the Flower criteria.

3. Not all information is available at the present. Make a list of information still needed and who should give this information.

Answer to Question 1: Plan of Action

Answers to Question 2:

EMAS Information

Is Paper fulfilling the Criteria

Answer to Question 3:

Information Needed

6.5 Working with the Eco-label: A Practical Approach

6.5.1 Part A: Arranging and Eco-label Workshop

Preparation

Participants: It is very important to work together with various stakeholders. They provide both practical/technical support as well as attract media and companies.

Industry associations: Know who the companies are, available resources (news letter, industry knowhow etc.). Can contribute with information dissemination and practicalities.

Ministries: Knowledge on political and topic level. Can contribute with knowledge (legislation etc.) and by attracting media coverage.

Testing/certification centres: Technical know how. Can provide assistance with application process, testing etc.

Others: Organizations that may have an interest in environmental matters: Can provide support through their member networks.

A GOOD MIX OF STAKEHOLDERS IS CRUCIAL FOR A SUCCESSFUL WORKSHOP AND STRESSES THE SERIOUSNESS AND IMPORTANCE OF THE EVENT.

Companies: Key/relevant companies. Exporters to the EU, Trendsetters. These types of companies have a good reason to be there and are the most likely candidates for applying for the Eco-label. They will also influence other companies to apply. Example: Kansa work wear and Bestseller: Both the biggest in their field and ones the others follow: They got the flower and others followed.

Authority speakers: They are very good to set the scene for the main presenters. They should speak first and usually they leave after a while. Always forward some basic information to them about the event and the Eco-label that they can use in their speech.

Topic speakers: These are the main speakers that will inform the companies about the Eco-label. If possible invite a European Eco-label expert for extra assistance.

Program and Contents

Program and content: The program is determined by the speakers, and content. Make it interesting

The content of the workshop should be balanced so that the participants are not falling asleep because you have an expert talking about the criteria for 3 hours to company representatives that may be from sales, product development etc.

Eco-label presentation: Remember that your aim is to attract companies to the Eco-label scheme and as such the main part of your presentation should be about why the Eco-label will benefit the companies.

Exercises: Ensure involvement of the participants (they are probably a little tired with all the information bombardment). Result orientated (is it input gathering, teaching, etc.)

Practicalities

Venue: Together with stakeholders, select an appropriate place that can accommodate the number of expected participants.

Information dissemination: It is very important to send information to the companies (the program and a little description), the authority speakers (something that they can use in their speech), Media (news release), and who ever else is participating directly or indirectly. Provision of leaflets/brochures, PowerPoint Presentation copies, etc

Arrangement of equipment etc.: The venue should have most of the technical

equipment you will need, but ask the speakers/presenters if they would like something special. Your agenda should have adequate breaks so that participants don't get too tired and provide refreshments for breaks. Name tags for participants (easier to mingle in the breaks).

Prior examples

Thailand 2004: A workshop organised by the EU delegation to Thailand together with the Thai textile association: Speakers: The EU ambassador, The minister of commerce, the president of the textile association. Presenter/workshop holder (EU expert). Participants: 99 textile companies. Time period 8 am to 5 pm.

Agenda: registration, 3 short speeches, Eco-label presentation, Exercise/training on Eco-label application process. 2 breaks and lunch.

Results:

1. Eco-label Competence of testing centre that has consequently carried out both applications and testing for Thai companies.

2. Application and getting an Eco-label licence of 4 Thai companies.

3. Follow up activities by the Thai embassy to Brussels in cooperation with Export department and other stakeholders (Paris Texworld) and follow up project presently in progress

4. There are presently 9 more companies in the process of applying.

Europe: Eco-label Seminar: bad organization (15 companies present and 1 Competent Body speaker who gave allot of facts. The result was that 2 company representatives started to talk about their Eco-label licence and how they did not get any new customers and that it cost them money to get and so on. The Competent Body person could not respond to the comments and the seminar ended up with a negative atmosphere that was taken back to the company.

An Eco-label exhibition was organised recently and companies with Eco-label products were invited to exhibit. The event was excellently organised concerning strategic speakers, venue etc. The area that was not well organised was the invitation of possible buyers. As a result the exhibiting companies were not satisfied in that area and did not get the results they expected

Asia: A workshop was organised with specific objectives regarding the Eco-label. The event was attended by approx. 50 people. The result was half, half. The reason was lack of proper preparation in some areas

Lessons learned: Make sure you have a good mix of participants, a good venue with practical things, content, speakers etc all in order. One factor not in order can influence the outcome.

Attracting applicants

Focus groups: The main group of paper companies would be the ones that are presently exporting or are planning to export to the European market. They need to certify their products to secure their existing customers and to acquire new customers.

A secondary focus group are the companies that are progressive thinking and would like their company image improved.

Key elements: Research provides one with all the information necessary and is essential for both preparation, contact and follow-up as described in the previous slides.

Contact may be either through an association, an event or one to one meetings.

Follow-up activities should be planned before the contact is made and modified after the initial contact and results/evaluation

6.5.2 Part B: Standard PowerPoint Presentation for Paper Presenters

Introduction

Objective: Attract applicants to the Eco-label scheme

Target: Paper companies

TOPICS:

The following are the basic topics that an Eco-label presentation for the Paper industry should contain. A presenter can also add other topics depending on the composition of the participants. For example: slides on the paper industry in Brazil/environmental effects, slides on EU/Brazil trade agreements etc.

The subtopics are also suggestions of basic information that should be included - A presenter will have allot of material to choose from after this training session

Overview of the Eco-label: A general description of the Eco-label (what it is, the purpose/role, status). A summary of the Eco-label in most cases is adequate and most participants get bored if too much information is presented.

The Eco-labels for paper in Europe: Other Eco-labels used to certify paper products, status etc.

Market trends and drivers: Regarding consumers/retailers/producers-industry associations and GPP

Benefits: Company image, competitiveness, Access to marketing opportunities etc.

Success stories: Companies using the Eco-label

NOTE: Details of the above Topics will be presented comprehensively in other modules so this standard PowerPoint presentation is for guidance.

Overview of the EU Eco-label

An environmental label for non-food products and services.

Purpose: To promote sustainable products and reduce environmental damage

The symbol is the flower

The main role of the Eco-label is to support the SCP and SIP (Sustainable Consumption and Production) (Sustainable Industry Production) action plans which is aimed at promoting sustainable products and reducing environmental damage.

There are many National Eco-labels in the EU which are recognised locally and negligible recognition outside the specific country/region. The Eco-label has a European dimension and the aim is that it will eventually be recognised throughout the EU.

The EU Eco-label is also open and encourages synergy with the National Eco-labels: It is working quite well with a number of countries such as the Nordic Swan in Scandinavia, the Austrian,

Product definition: The Eco-label criteria define the environmental and quality aspects of a product and this in turn makes easy for:

- Consumers to choose a product and feel confident that the product is the right choice.
- Retailers can also choose products without having to spend allot of time researching, asking questions for product information
- Producers do not have to answer a long list of questions when hey are supplying both retailers and the public sector.

The situation in Europe:

About 230 new companies received the Eco-label in 2008: 45% increase from

2007 and about 70% since 2004.

Presently there are 38 companies with licences for Paper products which make the paper product group the 7th biggest group.

Criteria

Criteria overview: Cover the criteria and remember that the participants are probably not technically educated so a general explanation is fine.

Application process: Refer to the previous session for information on all the points.

Eco-labels for Paper Products in Europe

Nordic Swan Aenor El Distintiu Milieukeur Blue Angel Umweltzeichen NF Environnement Environmentally Friendly Products The Hungarian Eco-label

The Polish eco mark The Global Eco-labelling Network – GEN TCO Development The Swedish Society for Nature Conservation (SSNC)

The different Eco-labels can be found on the Eco-label web page or through the National Competent Bodies. The Competent Bodies have figures about the number of paper products certified by the national Eco-label and the flower. Some have figures on the recognition level.

For example: Nordic Swan 67%, German Blue Angel 83% Austrian label 45%. EU Eco-label 11% (Eurobarometer)

Companies than ask “isn’t better to get the Blue angel: A good answer here is YES if you only sell to Germany, but if you want to sell to Denmark than you have to get the Swan and if you want to include other countries what then. The Flower is not known as well as the Blue angel in Germany but the level of recognition is increasing every year and it is throughout the EU. There are not many people that know the Blue Angel outside Germany.

Market Trends and Drivers

The point here is to show that the buying habits of the EU consumer is changing and as so are the buying habits of retailers and public purchasers and as a result the companies are adjusting to these new trends and drivers.

Consumers: Information today is more readily available to the European consumer. The media are constantly covering climate/environmental topics and information flow in general is easily accessible. This makes the consumers more informed and better equipped to make correct choices.

There are many influences and considerations when a consumer makes a product choice and price is the first priority for many. However, today’s European consumer is finding out that he can demand product quality and product sustainability without having to pay extra.

In principle, Eco-labelled products should not be more expensive than their conventional comparative products. In reality, Eco-labelled products are only marginally more expensive than an identical conventional product and much lees expensive than conventional “brand” products.

Retailers: The retailing industry is constantly changing and again the driving force is the need to sell and sell more. To do this they need to adjust to the consumer demands that are emerging. Retailers are starting to realise that asking for certified products does not imply extra work or expense. They can simply ask their suppliers for Eco-label products and it is up to the suppliers to fulfil this demand. They get the opportunity to promote themselves as “environmentally active”

Some of the biggest retailers in Europe are aware of the raising interest for sustainable products and are taking measures to meet this interest and are allocating resources to achieve this. Retailers such as Ikea, Carrefour, Kesko cooperation, Rewe group, Tesco, Metro, and Auchan etc. have joined the Retail

forum and are committed to the environmental programme.

Producers: Companies today face a wide range of expectations from a variety of stakeholders. These include employees, consumers, regulators and the public, all of which demand to be heard and/or are involved in company activities and decisions.

Stakeholders expect businesses to not only generate revenue but have a positive effect on society and minimize whatever adverse effects may stem from their operations. First and foremost, they want to be able to trust that what companies say about themselves and their operations is reliable.

While great effort goes into ensuring compliance with rules, standards and codes of conduct, many companies increasingly see the benefits of also managing social, environmental and economic impacts in a structured manner.

This helps them to manage risk more efficiently, strengthen corporate reputation and brand, and build trust with stakeholders. A company's ability to manage such impacts well today is indicative of its ability to thrive in the future.

In recent years, the definition of business success has expanded from how much money an enterprise makes to how it makes its money.

It has been proven that a company which implements an environmental management system will benefit both in terms of saving money and from a "company image, competitive edge" point of view.

Industry associations: have realised the potential in Eco-label products and have been active in both the criteria development and some promotional activities.

Companies are also realising the benefits of product certification especially in the last four years where CSR and product certification (National and EU) has exploded.

GPP and the Eco-label

General info: Public procurement accounts for 16% of the EU GDP. In 2003 the IPP (Integrated product policy) was introduced to reduce environmental impact of products through several actions: ONE being GPP where the commission encourages member states to draw up publicly available National action plans for greening PP. NAPs (National GPP policies & guidelines) shows the status of GPP in the 27 countries. In 2004 based on the Lisbon agenda, the commission launched ETAP (Env. Technologies action plan) with the objective of promoting env. Technologies. One of the means listed is to improve market conditions for env. Technologies through GPP.

Paper product sheet: A part of the EU commission training kit and it is intended for the **PP's. C**ontains information about the core GPP criteria (addresses the most significant env. Impacts) and the comprehensive GPP criteria (intended for use by PP's) as well as compliance requirements

The Eco-label in GPP: The Eco-label is a tool that can be used to show that the paper product in question complies with the GPP criteria. Note that the PP cannot ask specifically for any particular Eco-label. However the Eco-label can be used by PP's both as a source for env. Criteria for specifications and as a form for verification.

Joint procurement: Combining more than 2 contracting authorities. Benefits such as possible lower prices, Cost savings (administrative, workload), learning and gaining from bigger authorities

Examples of some specific initiatives/comments: Partnership for public green purchasing (Denmark).

Competent/consultants training of PP's. The reason that so much detail about GPP is given is to show that products with the Eco-label are and will be first in line… This is a most relevant argument when talking to the industry. Training of E-12

Competent Bodies over the next 2 years in various areas including GPP.

The Eco-label in Your Company

Benefits: This is always what interests the companies most because their first priority is to make money.

Competitive edge: Today, most companies can produce the same products with similar prices, quality, terms etc. Prices are determined both by production, transport, branding costs etc. What the Eco-label provides is an extra competitive edge for 2 similar products

Platform: Penetrating the European paper market by using the Eco-label

Company image: This is becoming more and more important and progressive companies are implementing SCR (sustainable corporate responsibility) where the environmental policies are clearly defined.

Retain customer loyalty: Customers remain loyal when they can see that the supplier is aware and working with environmental issues. This in turn gives the customers the possibility to market themselves as environmentally concerned and show it through their Eco-label products.

Product definition: The Eco-label on your products defines your products and all the way through the chain to the consumers. Consumers/retailers: guarantee for quality/env. performance.

Producers: it gives your products an official approval in both the environmental and quality aspects. Makes your products credible. Offering a real choice

A tool for:

Life Cycle management:

The Eco-label is based on “cradle to grave” principle and that means that your products are also and this is an effective tool for managing your products environmental performance.

Marketing opportunities: This is also of interest and one can point to the private and public sectors. The public paper use will over the next few years be Eco-labelled because of GPP initiatives. The retailing sector is also another area that is growing because of both consumer demand and retail initiatives. The Eco-label companies also get the opportunity to be listed on the Green store. (Add more info from module C).

Success stories

Example in the textile area:

Jyden work wear: SME producer of uniforms etc.

Eco-label competent staff: Know what they are talking about.

Using customer targeting techniques

Public sector: Actively to get municipalities as customers: Success with hospital wear uniforms etc.

Private sector: have Scandinavia’s biggest Dairy and medical companies as customers (uniforms) keeping them happy

UPM: The world’s largest producer of graphic paper sells about 250,000 tons of Eco-labelled paper products per year with annual revenue of 3.8 billion Euros.

They have been Eco-labelled since 2006 and have implemented Quality, environmental, health and safety systems as well code of conduct policy and PEPC, FSC certified.

They use their web page to inform about all their efforts in the above areas. They understand and can see the importance of sustainable production and social

responsibility.

Other examples:

Lenzing: Austrian Worlds largest producer of modal,.. Fibres. They include the Eco-label in all their promotional activities (brochures, exhibitions etc.) and have recently made a short 5 min. film about it. They also included Eco-label activities in a road-show for their Asian customers.

7 Module C: Marketing Eco-labelled Products

7.1 Introduction

Learning Objectives

Get a comprehensive understanding of a new green way of selling goods.

Get an overview on general trends and discussions.

Programme

The marketing module consists of three units:

UNIT I: Eco-Marketing

The first unit is dedicated to get a useful marketing know-how and overview on general trends and discussions.

Part I: Basics in Eco-Marketing

- "Green marketplace" – philosophy or contribution to climate change?
- Ongoing trends in consumption behavior and pattern
- Consumer types: attitudes and purchasing habits, segmentation models
- The style of eco-marketing: emotions or facts?

Part II: Key elements for successful Eco-label marketing

- Set up a partner network
- Below the line marketing
- Win-win-situation with cross-marketing
- Point of Sale Presence and how to get goods visible in the stores

Part III: The use of practical tools

- The marketing guide
- The EU Ecolabel acquisition guide

Exercise: Become familiar with marketing and develop consumer profiles and cost-efficient marketing strategies on textiles, footwear, TV and paper.

UNIT II: Eco-label Campaigning and success stories

The second unit will present best practice stories:

- Blue Angel, Germany
- EU Eco-label and Austrian Eco-label peacefully together at retail market

7.2 Basics in Eco-Marketing

7.2.1 Basic Terms

Overall Goals of the Train-the-Trainers

System marketing: To provide technical knowledge on how eco-labelling can be promoted through government and other stakeholder's actions. The training is also meant to provide basic knowledge on eco-labelling to national experts interested in the development of an eco-labelling scheme. It should help in developing a cost effective and flexible marketing strategy.

Product marketing: The trainers should also be able to inform industry stakeholders about useful steps for marketing their eco-labelled products and provide marketing support for licence holders.

Acquisition: The trainers should be able to enforce targeted acquisition and to provide basic assistance in the application process.

Why Marketing?

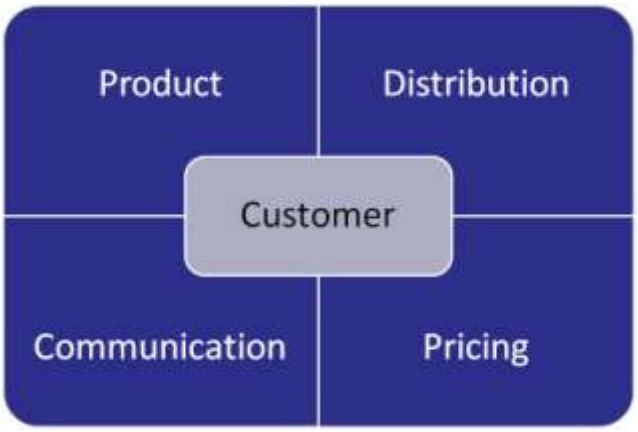
Studying marketing will make you aware that profound knowledge about marketing activities and techniques is necessary to sell goods successfully. However, marketing costs money. An appropriate strategy and the right mix of instruments will avoid wasting time and money.

Rule-of-thumb: Up to one-half of buyer's Euros go for marketing costs, e.g. if you spend €12,- on a CD, about 50 percent goes toward marketing expenses. This includes advertising, promotion & distribution and profit.

On a long-term view marketing should build a strong relationship with customers (customer loyalty) and stakeholders!

Check a Clear Marketing-Mix

Marketing activities should be planned in detail, implemented at the right time and regularly controlled. They should meet the needs of the customers in a defined target market. Marketing provides different instruments to achieve the attention of your target group.



Product: You need a marketable product or service which satisfies the needs of somebody, there must be recognizable benefits; in terms of eco-marketing: you decide to launch an organic product, energy-saving product, or a durable good.

Distribution: You need to plan a distribution channel how to reach your customer, by retailers or direct sales (with face-to-face contacts); in terms of eco-marketing: delivery by rail or trucks (offer climate compensation).

Pricing: You have to set a price – either a high level or a discount level price (mass market); in terms of eco-marketing: eco-products do normally cause higher production costs, for that reason the retail or shop price is above traditional products, find arguments for that (=env. Benefits).

Communication: Communicate information about your products by advertising, PR, Sales Promotions etc.; in terms of eco-marketing: find ways and messages to communicate your customers on the eco-friendlyness of your products, get your eco-labelled product sexy, and find an environmental claim (no green-washing).

To develop a profound marketing-mix the marketer must gather detailed information about the customer, its habits, its income, gender, education, age etc. (socio-demographic data).

A successful marketing mix achieve that products become a part of everyday life. The consumer gains personal benefits (e.g. environmental or health benefits) by using these products.

Define a Target Market

Companies are focusing their marketing activities on a defined market, the target market. Defining a target market helps to avoid divergence losses. Find out your

targeted customers in a market niche or in the mass market.

Please note, that marketing activities take place in a dynamic environment. Today is not tomorrow! There are competitive, political, legal, technological and socio-cultural forces, which enable or threaten our activities!

Example enabling forces:

The EU Commission (EU EACI) started 2008 a new Eco-innovation initiative called “Competitive Innovation Programme” (CIP). Through this Eco-innovation funding scheme, the EU wants to support innovative products, services and technologies that can make a better use of our natural resources and reduce Europe's ecological footprint. One of its objectives is to bridge the gap between research and the market.

http://europa.eu/agencies/executive_agencies/eaci/index_en.htm

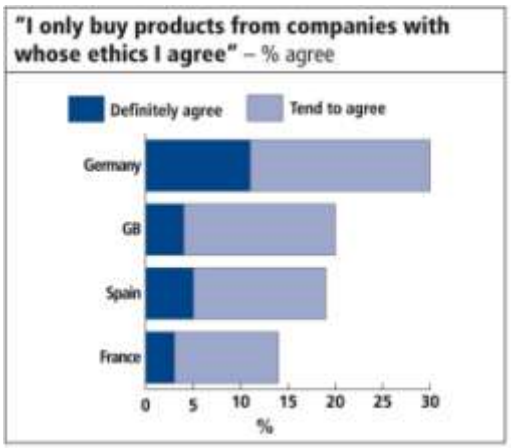
Local Versus Global Economy

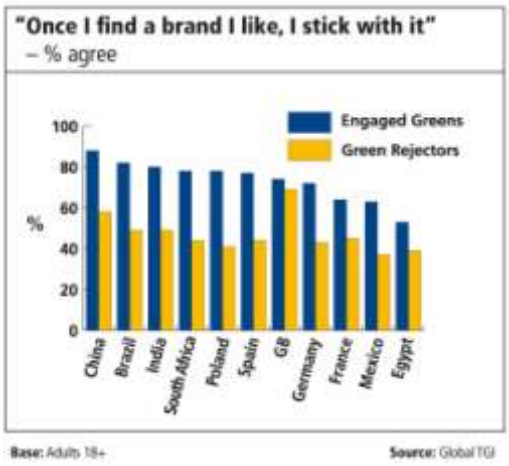
For reasons of environmental protection as well as socioeconomic reasons we should give local productions a higher preference. Advantages: less CO_2-emissions, fair distribution of income and improvement of local economies (LED-Local economic development).

Brand Marketing

Brand marketing is a process of developing a unique image for your corporate identity or product. It uses various techniques to create brand awareness. Advantage: Professional brands have a better listing in search engines. Furthermore, it also helps to develop a better customer-relationship. Green branding describes techniques of brand marketing focusing on green consumers. Surveys revealed that green branding affects consumer purchasing decisions more visibly in some markets than others, e.g. in Germany 30% of consumers say that they only buy products from companies with whose ethics they agree, compared to just 14% in France.

Source: TGI Surveys





Emotional Key to your Success

Create a positive change! Spread optimism!

Find promotional partners too, e.g. in the field of charitable organizations to help children etc.!

An environmental change must also be a social revolution (Environmental responsibility is linked to social responsibility).

7.2.2 Green Marketplace

Green Philosophy or Contribution to Climate Change?

The green market has been growing considerably in the last few decades and is quite more than a green niche. It is an upcoming opportunity and challenge for our economies to make profits and to create a strong contribution against climate change.

Figures show that the green market is more than a niche in Europe:

The Opportunities:

- Turnover € 227 billion, Turnover 2.2% of GDP

- Create 3.4 million jobs

The Challenge:

- Greenhouse gas emissions set to see a 2.5 to 3 fold increase by 2050

- Metals and minerals consumption are due to go up by 35-40% in 10 years

- Plastic to landfill rose up from 21% from 1990-2002

Source: EU-EACI, Eco-innovation, A wealth of ideas for a greener Europe, 2008.

Figures for US and Austria

Figures for the United States:

Research from the Natural Marketing Institute (NMI) estimates the size of the green marketplace to reach 420 billion Dollars by 2010 (of that 118 billion for personal health including natural/organic foods, 10.5 billion for natural lifestyle including furnishings, cleaners, natural pet products etc.).

Sales in organic textile shops are growing by 35 % annually since 2004 in US.

Organic Exchange stated 2006 sales of organic textiles estimated at 1 billion Dollars.

Source: Nielsen White Paper; www.organicexchange.org; Greenomics, zukunftsinstitut 2008

Footnote: NMI is a strategic consulting, market research, and business development company specializing in the health and wellness marketplace. NMI became famous for their LOHAS report, which is based on a market research in US (see below).

Figures from Austria:

Ernst & Young estimates the LOHAS-market segment for food at about 30 percent, based on a research among 700 customers in AT.

Source: Ernst & Young, LOHAS-Lifestyle of Health and Sustainability, Oct. 2007

Ongoing Trends in Consumption Behavior and Pattern

Homing: (a behavior that is related to the Biedermeier, a romantic era in 19th century) Consumers attach more importance on their home, on familiarity and security. This is connected with good taste and a modern lifestyle. An important aspect is also health and eco-friendliness.

Luxury and simplicity: One trend becoming apparent is an increasing preference of luxury combined with high quality. But households have reached a saturation point to fit more items in their flats. Thus, the consequence is that the trend for reduction and simplicity or “less is more” is increasing. Items reflecting this trend have a high degree of craftsmanship (long lifecycle, durable, recyclable) but are hyper-modern.

Statement Faith Popcorn, the world famous trend forecaster

She became famous in the 1980 with cocooning. She also claims a new pattern of consumption for the middle class. They require a simple lifestyle.

Vocabulary: cocooning, cashing out, In-culture Marketing

LOHAS- the new lifestyle-trend

LOHAS = Lifestyle of Health and Sustainability

This new lifestyle trend creates new “Super”-Consumer

Example: Actress Kate Blanchett wears organic cotton textiles

7.2.3 Consumer Types

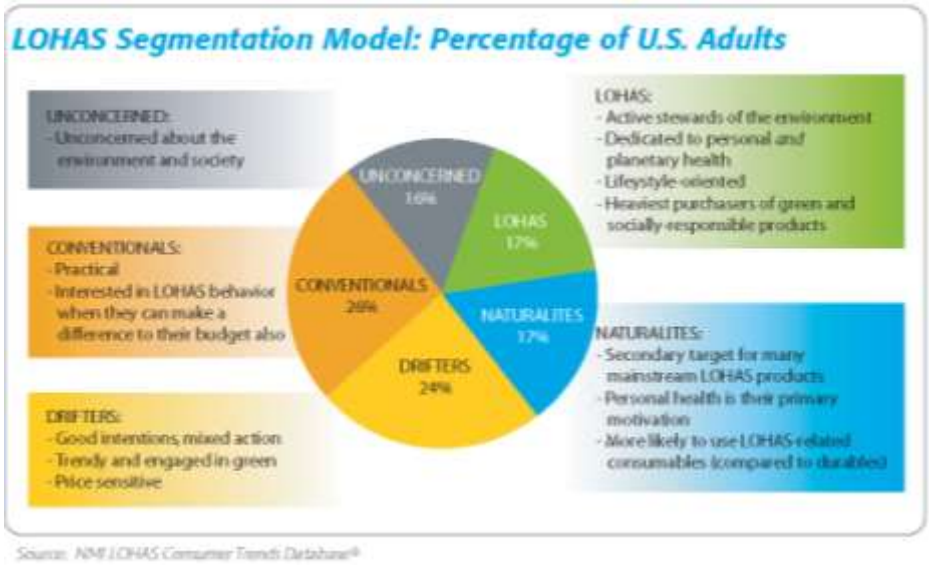
Segmentation of the Market into Target Groups

An adequate communication strategy would need to identify the right target groups who are concerned to the adequate information. Various research or marketing institutes developed segmentation models, which are helpful to learn about the attitudes and habits of the consumers. They can help to identify different types of “green” or “green-relevant” customers more effectively in order to draft a differentiated marketing-mix. Marketers should identify consumer groups who are accessible to green messages.

However, marketers should consider that the 1:1 transfer of models from one market to another is problematic due to the local or regional differences. Best practice would be to develop own models based on local or regional conditions.

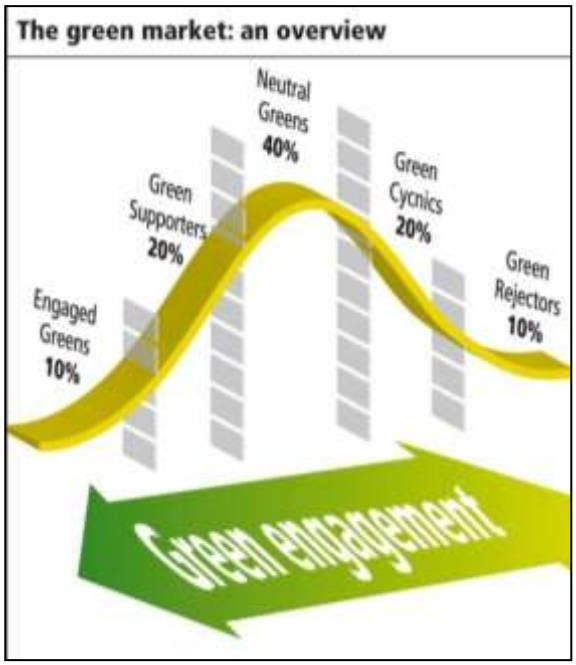
Model I: The NMI's LOHAS Segmentation

The US-research institute Natural Marketing Institute (NMI) developed a segmentation model to classify consumers, which is based on their attitudes towards health and sustainability (called LOHAS Segmentation Model). It has been in broad use since 2002 to understand the green marketplace and to help manufacturers designing appropriate strategies. The model has been developed mainly for the US market, but expanded in many other countries until 2009. The most environmentally-concerned consumers fall into the LOHAS segment (17% of U.S. Adults). Also concerned about the environment are the segments Naturalites, Conventionals and Drifters. Only 16 % of the population is not concerned about environmental issues.



Model II: Marketing Insights from TGI

TGI – a global network of single-source market research surveys from 60 countries across six continents – published a segmentation model different to the NMI-model. It ranks from engaged greens to green rejecters or anti-greens. The last group poses the greatest threat to environmental marketers because they don't believe it works and are not willing to participate.



Engaged Greens (10%)

The most passionate green consumers, who will go out of their way to help tackle climate change and pay a premium for eco-friendly products.

Green Supporters (20%)

Care about the environment and would like to adopt more sustainable habits, but won't make big sacrifices in terms of price, comfort or convenience.

Neutral Greens (40%)

Aware of environmental issues and will buy into green initiatives, but only if they offer functional benefits too.

Green Cynics (20%)

Doubtful about the value of environmental initiatives, and unlikely to choose to green alternatives.

Green Rejecters (10%)

Disengaged and most likely to rebuff all green concepts.

Thesis I: Eco-Adopters Will Act as Green Advocates (Green Ambassadors).

"Eco-Adopters" are consumers who demonstrate not just an environmentally-conscientious mindset, but also the willingness to put these beliefs into action. The Eco-Adopters are more likely to be financially secure, reside in major urban areas. Therefore it is easy to purchase eco-friendly products due to availability of large retail outlets. They are discerning shoppers, health-conscious and should take care about origins or product information like eco-labels on a product. If they are convinced they will act as positive green ambassadors or green advocates.

Marketing consequence: To provide relevant information by taking care of their attitude and habits.

Thesis II: Women are More Likely to Buy Eco-products.

Based on our practical experience we identified women as more open-minded for eco-products than men. They are more aware of health and environmental issues. Marketers know that the purchasing attitudes of women could be changed towards green aspects.

Marketing consequence: consider more issues with female context (family, future, health, etc.) in marketing strategies.

Thesis III: The Lovos are on the Move.

Recent publications reveal a move from Lohas (Lifestyle of health and sustainability) to Lovos (Lifestyle of Voluntary Simplicity). Lovos are aiming to reduce consumption but are in general open-minded about issues like saving energy, use of regional products etc. They are purchasing targeted and try to avoid unnecessary goods.

Marketing consequence: take care about the convenience of these target groups.

7.2.4 Consumer Trends

Consumer Types

Demographic changes have been apparent during the last few decades and have influenced the sale of products.

Are there trends among the consumer types?

Singles: in many households (urban agglomeration), half of all households are singles

50plus: The group of people over 50 years is increasing very fast.

Both groups have a higher proportion of disposable income than other groups!!

To reach these people with environmentally-friendly products marketers should satisfy their specific needs and behaviors! Aspects are: functionality, sensuousness, emotional need, beauty, design, and tradition. Living styles are very specific and dependent from personal taste, cultural and regional identity etc. Marketing strategies enable the adoption of different living styles and consumption pattern.

Family with kids: growing demand of environmentally-friendly products (compare the Danish Baby flower campaign). Relevant aspects are comfort, multi-functionality, safety standards.

Material Trends

From the 1970s to the 1990s synthetic material dominated all production schemes. After the turn of the century the composition of materials changed. The usage of natural resources became an upward trend. Especially the usage of wood and textiles increased.

* wood:

One example is the trend towards solid wood. In Austria a trendsetter is the company team7. This company received the AT-Eco-label at the end of the 1990s and is now one of the most important furniture producers and trendsetter for eco-designed products. A strong market effect should be attributed to certification schemes, of which the Forest Stewardship Council (FSC) is recognized most. The second important certification is Pan-European Forest Certification (PEFC) support by the furniture industry and branch organizations as well as some governments. Certification schemes caused a high impact on the furniture retail market towards beech, oak etc. from sustainable and regional productions. The usage of tropical woods decreased considerably.

* textiles:

A trend in the textile sector could be observed towards the use of organic textiles (organic cotton) and textile fibres based on sustainable productions (example: viscose fibres by Lenzing) or natural fibres (e.g. hemp).

7.2.5 Green Entrepreneurs

Do Ecopreneurs think differently?

An “entrepreneur” is someone who thinks of a new idea or opportunity in business and who takes a financial risk for the managing of his enterprise.

A “green entrepreneur” (or ecopreneur) is someone who is highly concerned with environmental integrity and social impacts of business.

Attributes of ecopreneurs:

- Combines the personal obligation to environment with economic development
- High responsibility towards nature and environment
- Take into account that their products will influence their children and grandchildren
- Open-minded to social issues
- Started their business to initiate a positive change

Source: extension.usu.edu/files/publications/publication/pub__4185646.pdf

John C. Allen, Ph.D., et al. 2006

Many conferences took place in the past years on Green Entrepreneurship. The idea behind them was to present ways and possibilities to initiate a green market. These activities are often promoted by governmental institutions as part of a strategy in the global fight for the environment. In many countries funding programmes to support green entrepreneurship have been released mostly in Europe, North America and in other parts of the world.

7.2.6 Media Relations

Goals

- Identify homogenous dialogue groups and initiate a vital dialogue
- Disseminate information for

Potential licence holders: Additional value, criteria, application process, costs, facts & figures, success stories

Public purchasers: Additional value, criteria, how to use criteria, facts & figures, success stories

Consumers: Additional value for consumers (health, environment, etc.), success stories

Licence holders: How to market the label, success stories, facts & figures.

7.2.7 The Style of Eco-Marketing: Emotions or facts?

The Old Style: Facts & Figures

When environmental marketing began in industrialized countries there was a belief that environmental issues had to be communicated in a very fact-oriented manner. The environmental problems are serious issues and they should be explained by scientific proof. The more facts & figures and the more text in brochures and ads the more credibility and acceptance they are expected to have.

This fact based communication works well with consumers being highly involved in environmental issues and products. They have decided for an eco-friendly lifestyle and they are seeking vast information about new trends and new problems.

However, this communication approach fails with low involved consumers. To get their awareness emotional communication styles have to be adopted. This is the

only chance to reach a wider audience in times of such complete information overflow in the media.

The New Style: Emotions for Ecology

More and more campaigns for eco products and environmental issues are using the same mechanics like conventional brand communications: they create positive emotions and fascination going with the product or theme. They are lifestyle orientated and cause positive feelings and attractive brand worlds around the product. Emotional tools such as more pictures are used instead of long text, fancy events and videos with high quality. This style of communication called Ecotainment is focusing much more on environmental solutions than on elaborating the problems. They talk about the “fascination of sustainability” and the new technology which are developed, e.g. in solar energy, a new concept for housing and traffic, smart and sustainable products shows pictures of a positive future.

The Key Consideration in Eco-marketing: Credibility Management

Can such a style of eco-communication still be credible? Doesn’t that look like green washing and like a company being too little aware and responsible of the world’s problems? Of course the environmental problems have to be mentioned, but it is just the focus which should be on the positive solutions. That such solutions integrated in products are valid, strategic credibility management has to go with them. One instrument to gain credibility is to use an eco-label. To boost credibility additionally is to form alliances in communication campaigns with state bodies and/or NGOs which endorse the environmental innovation and progress build into the product.

7.3 Key Elements for Successful Eco-label Marketing

7.3.1 Designing an Organizational Structure for Marketing

Marketing Process from the Macro View

An important concern in the implementation of an Eco-label scheme is marketing planning. It can be defined as a systematic process of assessing opportunities and threats, determining objectives, strategies, and steps of implementation as well as control of the entire process. The outcome of the process of planning is a marketing plan which has to be confirmed by all relevant decision makers.

It is advisable to enhance the marketing plan with a quality management system. The adoption of a QMS improves the culture in all areas of organization and will meet stakeholder’s perception at best.

Quality Management System

Source: www.euecolabel.eu

A QMS requires:

- A defined organizational structure
- Distribution of responsibilities
- Transparent procedures and processes
- Allocation of resources

Marketing Planning with a Long-term Perspective

The development of a marketing plan should cover strategies for at least 3-5 years. Determine a schedule with the major milestones. To begin with the marketing process should be the focus on the development of the Eco-label scheme:

- Identify interested key stakeholders

- set up a network of partners (consumer organizations, NGO's, etc.)

Marketing has to support targeted acquisition:

- Start communication to identified companies to get interest for the Eco-label

- Provide basic assistance in the application process

- Develop best practice examples (find first movers, test phase) and show how they implemented the Eco-label successfully (emphasize the benefits)

- Provide marketing service for licence holders (e.g. marketing guide, checklists etc.)

Active marketing for Eco-label products should consider following aspects:

- Allocate sufficient financial and organizational resources

- Identify a defined market segment with targeted consumer types

- Develop adequate information tools (Web, brochures, fact sheets, presentation ppt …)

- Start media relations; develop a press-kit (with standard articles, background information …)

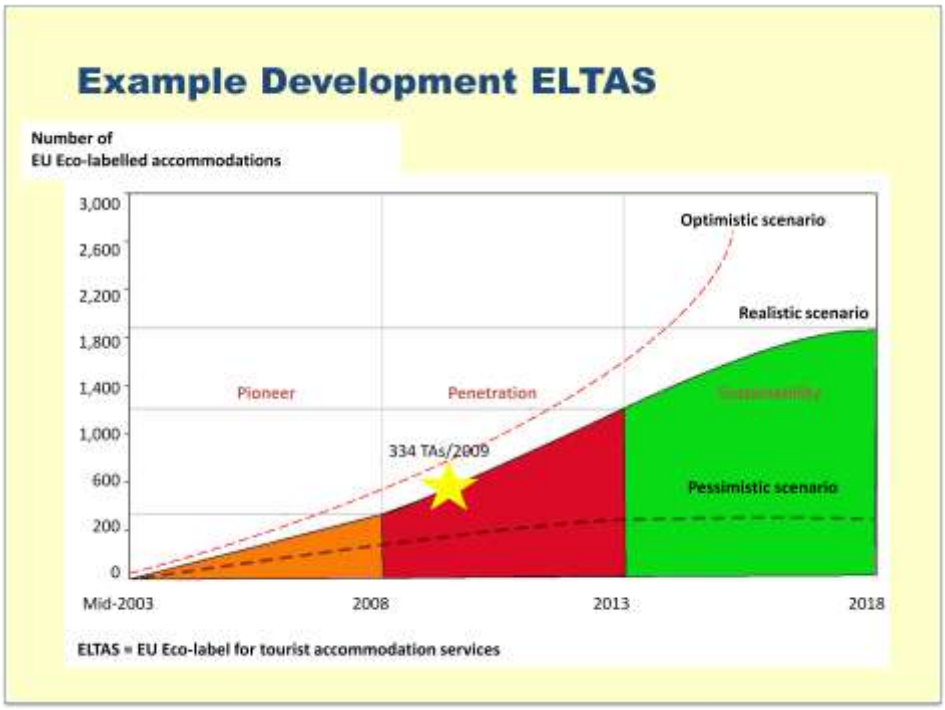
- Participate actively at trade fairs and events (present the Eco-label)

Phases of Development:

Divide your long-term plan into several sections:

- a preparation and pioneer phase, which is characterised by marketing activities to establish the Eco-label scheme firmly, to develop a market-relevant product cluster, carry out market tests with pilots, and to find first movers

- a penetration phase with strong marketing activities (campaigns) to increase the number of eco-labelled products in the shelves



Estimation of the development for the EU Ecolabel for tourist accommodation services (ELTAS):

During a marketing project (Mid 2003), the development of the EU Ecolabel for tourist accommodation services has been estimated with three scenarios in three phases.

Pioneer phase:

Getting eco-friendly pioneers easily without large marketing efforts,

low level of recognition

Penetration phase:

Increasing marketing efforts multiplies the market demand,

recognition partially 25-40 %, considerable marketing campaigns

Sustainability phase:

Demand in eco-labelled accommodation is high,

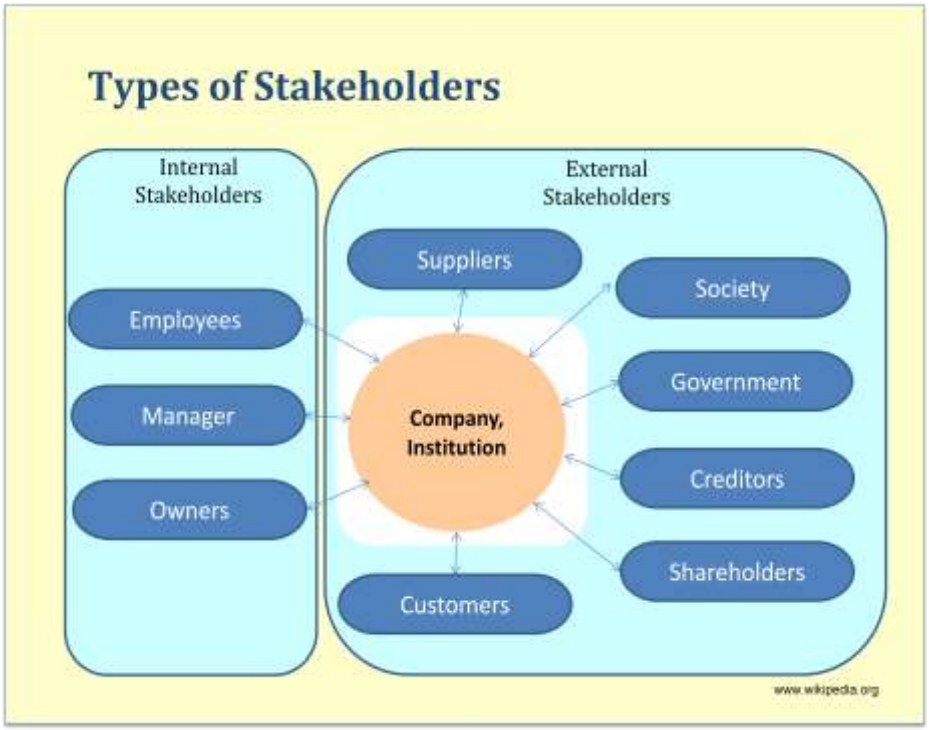
recognition > 40 %, EU Eco-label is established

Note 1: The EU Ecolabel for tourist accommodation services was launched mid 2003; meanwhile (end August 2009) 334 tourism businesses are eco-labelled (EU-27).

Note 2: The Optimistic scenario is based on the assumption of a strong organization development (with strong Competent Bodies), high marketing budget, and high network of partners (enablers). The Pessimistic scenario is based on a weak network of partners and marketing with a very low budget.

Stakeholders

As per definition, a corporate **stakeholder** is a party who has a “stake” or claim in some aspects of a company’s products, operations, markets, industry, and other outcomes (compare Farell, Marketing 2008, p7). Stakeholders include customers, employees, investors and shareholders, suppliers, governments, communities, and others. Stakeholders are able to influence the company in many areas. For that reason, marketing strategies should develop and maintain relations with stakeholders with a long-term perspective.



Eco-label Relevant Key Stakeholders

Numerous stakeholders interact in the medium of a complex product supply chain. Eco-label marketing should consider interests of following key stakeholders:

- Shareholders
- Investors
- Employees
- Customers, Consumers
- Retailer
- Competitors
- Policy Makers
- Suppliers
- Consumer organization
- NGOs, Environmentalists, Educational institutions
- Social partners, Trade associations, Chamber of commerce, Trade Unions
- Media

Key Questions

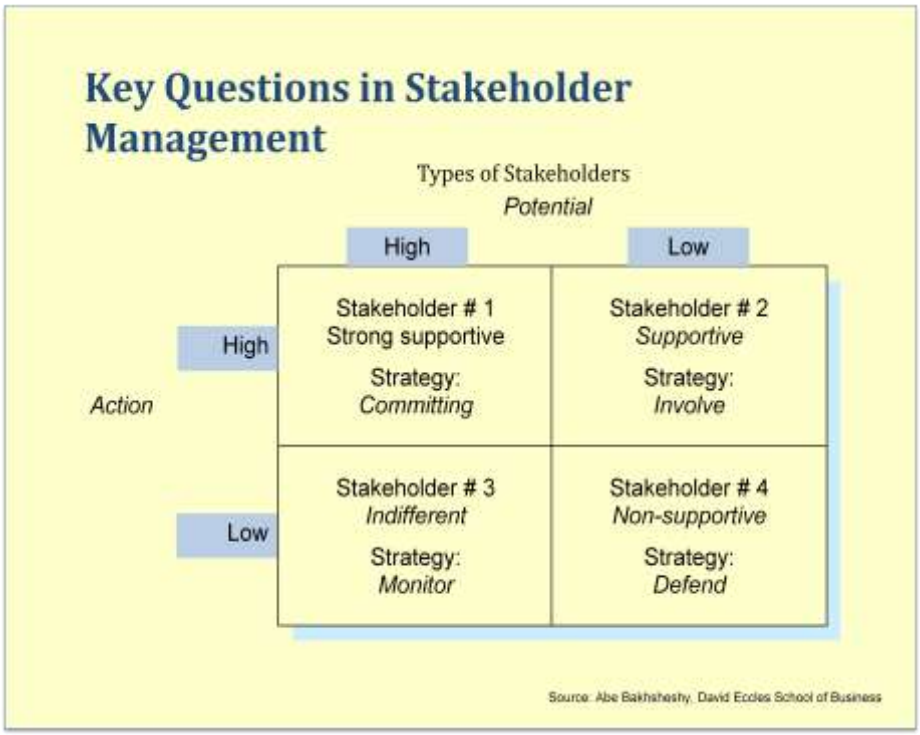
- Who are our key stakeholders?
- What are the interests of the key stakeholders?
- What is the influence of the key stakeholder?
- What actions should we take to face the stakeholder's interest?

Affecting Potential of Key Stakeholders

- Controls key resources
- Strong political influence
- Likely/unlikely to take action

- Likely/unlikely to form co-operation
- Likely/unlikely to form coalition with others
- Existing communication channel

Stakeholder Management



The main criteria to check are:

- Does the key stakeholder control key resources?
- Is there a strong political influence?
- Does the key stakeholder likely/unlikely take action?
- Does the key stakeholder likely/unlikely form co-operation with us?
- Does the key stakeholder likely/unlikely form coalition with others?
- Is there an existing communication channel?
- ……

Example: Five Key factors for Eco-label Product Marketing 2008

During the marketing pilot campaign by the EU Commission 2006-2008 following key factors have been identified as most relevant:

1. Media Relations: provide articles, AV-Media, advertorials

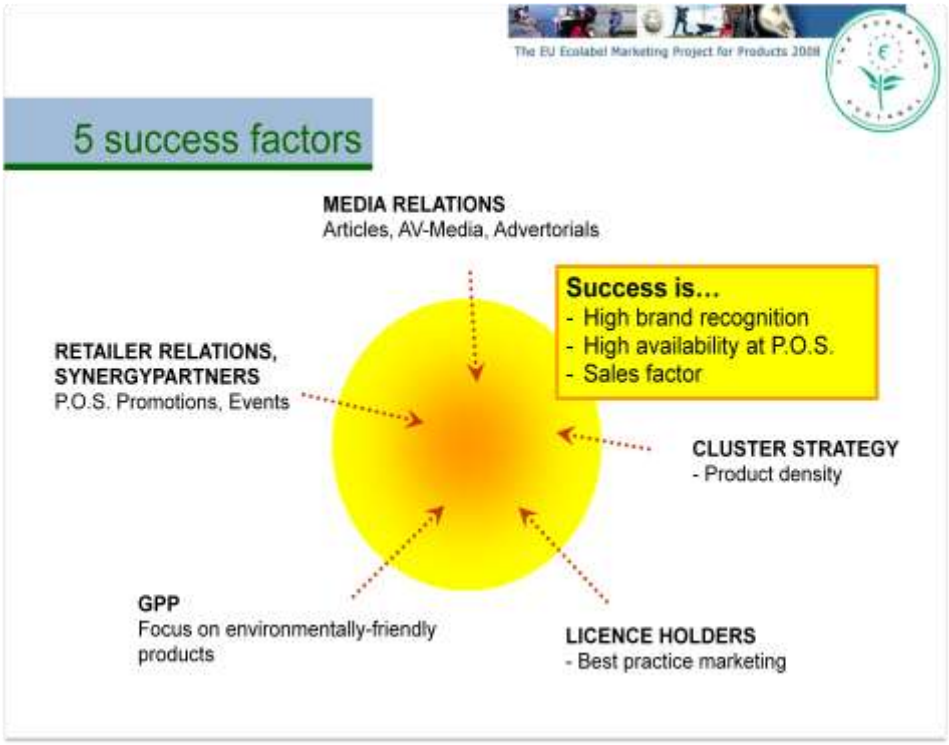
2. Retailer Relations: find synergy partners and present the Eco-label at Point of Sale (P.O.S.) with promotions

3. Licence Holder Marketing:
- Find applicants
- Best-practice marketing

4. GPP: Public procurement: focus on environmentally friendly goods and services

5. Cluster Strategy: Concentrate your resources on a product cluster and increase the product density.

Success Factors

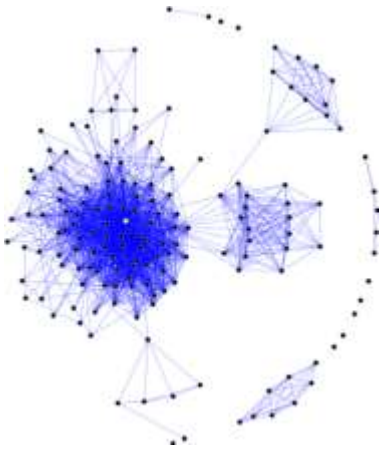


Source: www.euecolabel.eu

7.3.2 Partner Network

Set up a Partner Network

In theory a social network is a social structure made of nodes (which are generally individuals or organizations) that are tied by one or more specific types of interdependency. Using a social network in the framework of marketing provides a perfect multiplying effect as it extends social connections to a large extent. Within this network “green ideas” can be forwarded easily so that there are common interests and objectives. Large social networks can exercise a strong influence on the attitudes of people or organizations. Dynamic networks can be highly successful as long as there is an effective control.



Source: Wikipedia

Practice

To establish an effective network, synergy workshops have proven to be a very

Example: Synergy-Workshops as Networking Instrument

useful method of communication. Within the framework of an EU Eco-label product marketing contract 2008, a series of synergy workshops has been undertaken. The main objectives behind the synergy workshops were to start initiatives to motivate key stakeholders towards the EU Eco-label as well as to improve the quality of the acquisition techniques.

Key results:

- Improved strategy how to approach to companies

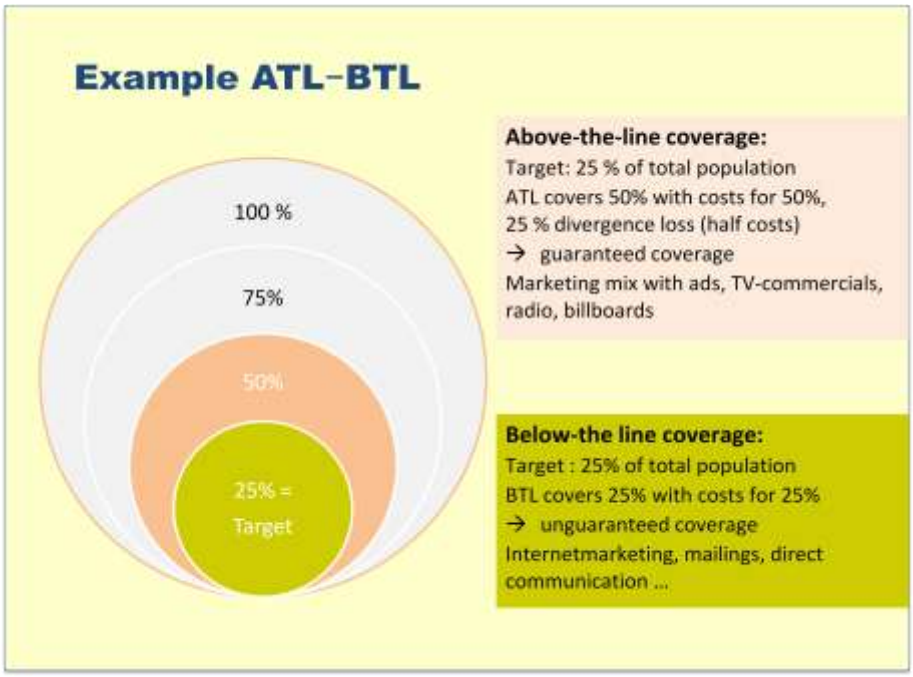
- Improved strategy how to start POS-co-operations with retailers

- Exchange of experience in the implementation of the EU Eco-label in the marketing of licence-holders

7.3.3 Below-the-line Marketing

Below-the-line Marketing as Last Resource

Classical marketing campaigns put millions of dollars in TV-commercials and full-page paid-ads in magazines with strong coverage. This is business as usual in the daily routine of advertising agencies. The primary condition is the allocation of sufficient money. Different to product advertising Eco-label marketing suffers such conveniences. However, there are ways to address your message to your target groups with low budget instruments, called below-the-line marketing. Below-the-line-initiatives have proven to be the last resort for marketers when all the budgetary wishes have failed. The most important plus of below-the-line-marketing is that the costs of one advertising contact (based on per capita calculation) are a split of a TV or paid-ad–contact. Although it offers many advantages by reducing costs and better targeting, a campaign focusing mainly on below-the-line marketing must be established properly to be effective.



Low-budget means of communication:

- Direct mail with highly-targeted lists of addresses (maximizes response rates); check if your database is maintained regularly; use also free CDs with addresses.

- Use two-way communication; it is more efficient and it enables marketers to listen and learn about the consumer.

- Participate in key stakeholders seminars or fairs with trade visitors, it allows marketers to gather expert know-how and to give presentations to key audiences.

- Provide numerous customer response channels

- Keep abreast of latest development by keeping a dialogue with customers and investing in surveys.

The internet has been especially proven as an excellent channel for below-the-line marketing. Find following useful marketing techniques:

- Put your URL everywhere: Print it on your business cards, business flyers, letterhead, email ….

- Use a contact tag and logo on your e-mail: Attach your business contact with logo to the bottom of your e-mail.

- Easy-to-use-site: Check if your website is easy to navigate, check the wording, pictures etc.

- Give away value: Provide some useful files for your community and add value to your site, e.g. white papers from relevant studies, news (RSS-Feeds), checklists etc.

- Submit sites at search engines, directories etc.: Ensure that your site is top-ranked in search engines. Check your listings regularly.

- Blogging: Blog yourself by sharing your messages on your site or on other sites.

- Pay-per-click: Is becoming a new technique for marketing. Google provides this useful technique. Advantage: you pay just for the clicks; it reduces divergence losses (if your message is addressed properly).

- Establish a free on-line newsletter: Printed newsletters are expensive and as such they significantly reduce your marketing budget. Avoid hard copies by using on-line newsletters. Take care to gather e-mail addresses in time.
- Podcasting or newsfeeds: New techniques which are becoming most popular. Apple is the father of podcasts: A podcast is a free video or audio series — like a TV or radio show — that you download from iTunes and play on your computer, iPod, iPhone, or Apple TV.
-Viral marketing: Viral marketing and viral advertising refer to marketing techniques that use pre-existing social networks to produce greater brand awareness or to achieve other marketing objectives (such as product sales) through self-replicating viral processes, analogous to the spread of pathological and computer viruses. It can be word-of-mouth delivered or enhanced by the network effects of the Internet. Viral promotions may take the form of video clips, interactive Flash games, ebooks, brandable software, images, or even text messages. The basic form of viral marketing is not infinitely sustainable (Source: Wikipedia)
- E-mail-Marketing: Use every opportunity to collect useful e-mail address (-lists).
-Online Press releases: Write and launch press releases on the web. Use free observing tools on the web!
-Wikipedia: Check the Wikipedia entry of your Eco-label.
Find more about Internet Marketing tools:
http://ecnow.com/Internet_Marketing.htm

7.3.4 Cross Marketing

Win-win-Situation with Cross-Marketing

A marketing co-operation or cross-marketing is a partnership of two or more companies in the same level of marketing with the objective to bundle common resources. Check your key stakeholders and clarify possible co-operations.

Criteria for successful should be:

- win-win-situation
- common interest
- balanced input of resources
- commitment based on a written contract

Cross-marketing partners could be:

- licence holders
- retailers, trade organization, commercial partners e.g. bank
- NGO'S, consumer organizations
- media
- etc.

The benefits:

- For Joka: a presentation in the newspaper, and a financial profit by selling mattresses for the entire hotel (the hotel was equipped with environ. friendly mattresses)
- For the hotel: new mattresses at a special discount rate (one free mattress for the hotel owner) plus a free presentation in the magazine
- For the hotel chain: a perfect presentation that in one of their hotels (approx 25 hotels) guests are able to sleep in eco-friendly mattresses
- For the magazine: a interesting story plus a free weekend for their readers
- For the retailer: promotion in the newspaper; they distributed the magazine in their outlets (in the mattresses corner)
- For the Eco-label: cheap and very efficient advertising activity

7.3.5 Point of Sale Presence

Retailer Coops, Getting Eco-labelled Goods Visible in the Stores

A promising core element of Eco-label marketing is the co-operation with retailers, who are willing to promote the Eco-label and to place eco-labelled products in the shelves.

Successful POS-Mix

A successful POS-Mix is characterised as follows:

- Long-term commitment from retailers to eco-labelled goods
- Establish green product ranges
- Get the Eco-label visible at the market with crowners, posters, pillars etc.
- Provide Eco-label branded shelf-stoppers
- Set promotions with give-aways, quiz games

Guidance System

A POS-survey by the German Verbraucher Initiative e.V. was faced up to the question how the sales for sustainable products can be improved. Together with Quelle, a mail order house, and OBI, a do-it-yourself retailer, a survey revealed following important criteria to boost sales and enhance the perception of the consumers by:

- Better visualization and understandable declaration of quality labels
- The use of a guidance system with coloured signs (ceiling, floor) and shelf-stoppers

Source: Dt. Verbraucher-Initiative Germany, 2005

Identify Product Cluster

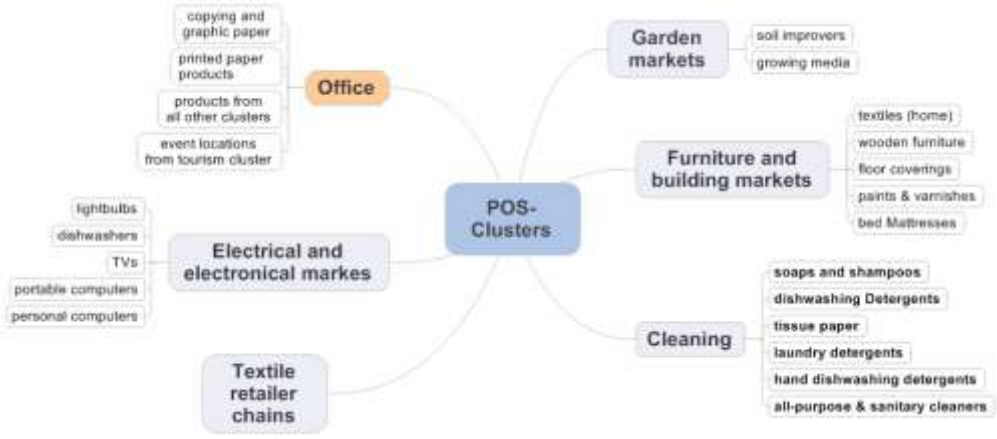
A good basis for marketing activities and acquisition activities is a cluster analysis built on P.O.S. clusters. This helps to allocate personal and financial resources efficiently. For that purpose check the number of available eco-friendly products by relevant retailers. This provides an image in which markets the P.O.S-density could reach a level of perception and underlines marketing activities as useful. Check also the types of markets at which eco-friendly goods are available.

Type of markets:

- Super markets
- DIY, building chains,
- Home & garden, furnishing houses
- Textile chains
- Perfumery chains

Cluster Model

Find following a model for a cluster analysis:



Source: Andreas Scherlofsky, 2009

Extend the analysis of the range of products from products with an Eco-label (European or national Eco-label) to products with other label schemes (e.g. FSC, PEFC, Fairtrade, organic labels …) in general. A synergy co-operation could be a win-win-situation for all.

The selection of clusters should consider following criteria:

- Importance in the consumer market (penetration strategy)

- Density of products in retail stores (penetration strategy)

- Revised or new criteria (Find first movers)

7.4 Practical Tools

7.4.1 Marketing Guide

Useful Booklet Available at www.euecolabel.eu

The EU Eco-label Marketing Guide is a booklet for licence holders and interested companies. It shows ways to integrate the EU Eco-label into the marketing strategy and how to use the EU Flower in marketing effectively and successfully.

The Marketing Guide was developed 2008 in the framework of a project of the EU Commission and translated into following languages: Czech, English, French, German, Greek, Polish, and Spanish. Attached is a two-page checklist which helps to assess the level of eco-label integration into the company's product marketing. The booklet can be downloaded at www.euecolabel.eu in low or high-resolution (for printing in a printing house or copy shop).

If you plan another translation, feel free to use the English master file (MarketingGuide-text_en.doc) as a basis for your translation. Just drag the final text and drop brick by brick into the layout master file (MarketingGuideMaster; 19 MB RAR-ZIP-compressed) in the Indesign-Format. The only condition of doing the translation is to inform the European Commission, DG Environment of your plan and to send a PDF of the final product afterwards (nicola.marinucci@eu.europa.ec).

Source: www.euecolabel.eu

The content of the booklet:
- New Consumer's needs
- Strategy and arguments
- Green campaigning (Danish Flower Week Baby Campaign, Shrink-proof strategy by Lenzing, A sharp success story)
- Best practice – examples
- Information and contacts
- Marketing checklist

Target Groups

The market guide was developed to provide useful know-how for SME's without large marketing departments or do not have in-depth environmental marketing know-how. It can also be considered as a tool how to implement the Eco-label quickly.

Arguments

A marketing campaign needs clear and understandable messages reflecting targeted benefits. To find these messages it is necessary to establish a FAQ.

Key arguments for the EU Eco-label are as follows:

- lower environmental impact

- strong and reliable criteria, verified by independent auditors

- official certificate from the EU Member States in collaboration with the EU Commission

- Contribution to sustainable economy

- Improves the quality of life (health aspect)

Successful implementation

- Benefit by actively using the Flower logo
- Adopt Marketing measures at the POS-Point of Sale
- Inform your retailers that the product is awarded with the Eco-label
- Launch a press release or organise a press conference on the occasion of the award
- Use communication channels from the Competent Body
- Inform your employees about the award, they are motivators and multipliers
- Set a message on your office supplies like envelopes, stationery (within the context of the awarded product).
- Use promotional material from the CB or EU Commission

Campaigning

Learn about successful campaigns from other countries.

- How did they organize the campaign?
- How could they raise the budget?
- Was there a traceable rise of sales?
- Who collaborated?
- Could the consumer recognition be increased?

Getting Information

Where do I get information?

- EU Commission: http://ec.europa.eu/environment/ecolabel
- E-catalogue: www.eco-label.com
- EU Eco-label Helpdesk: eco-label@bios.com
- GPP: http://ec.europa.eu/environment/gpp
- Some Competent Bodies: http://ec.europa.eu/environment/eco-label/contacts/competent_bodies_en.htm

Checklist

Get the useful marketing checklist at: www.euecolabel.eu

EU Ecolabel Marketing Checklist

7.4.2 Eco-label Ambassadors

Committed to the Eco-label

The European Flower Week 2004 – a LIFE-marketing campaign on the EU Eco-label – adopted stakeholders as committed "Eco-label Campaign Ambassadors".

The objective of this task was to attract, involve and commit ambassadors to the EU Eco-label campaign in order to have more stakeholders sending the same messages. Ambassadors successfully involved in the campaign carried out promotional activities in the EU Flower Week.

A Voice for the Eco-label

Campaign ambassadors can be appointed to be active for the Eco-label in

- Schools
- Stores
- PR
- Public events

Background

Campaign ambassadors will mainly be recruited from

- Licence holders
- Environmental and/or consumer organisations and NGOs.

7.4.3 EU Eco-label Acquisition Guide

A Handsome Tool to Approach Companies

The EU Eco-label Acquisition Guide is a tool for Eco-label acquisition, which was developed 2008 in the framework of a project of the EU Commission.

Source: www.euecolabel.eu

Objectives

The Acquisition Guide provides know-how, best practice, tools and checklists for

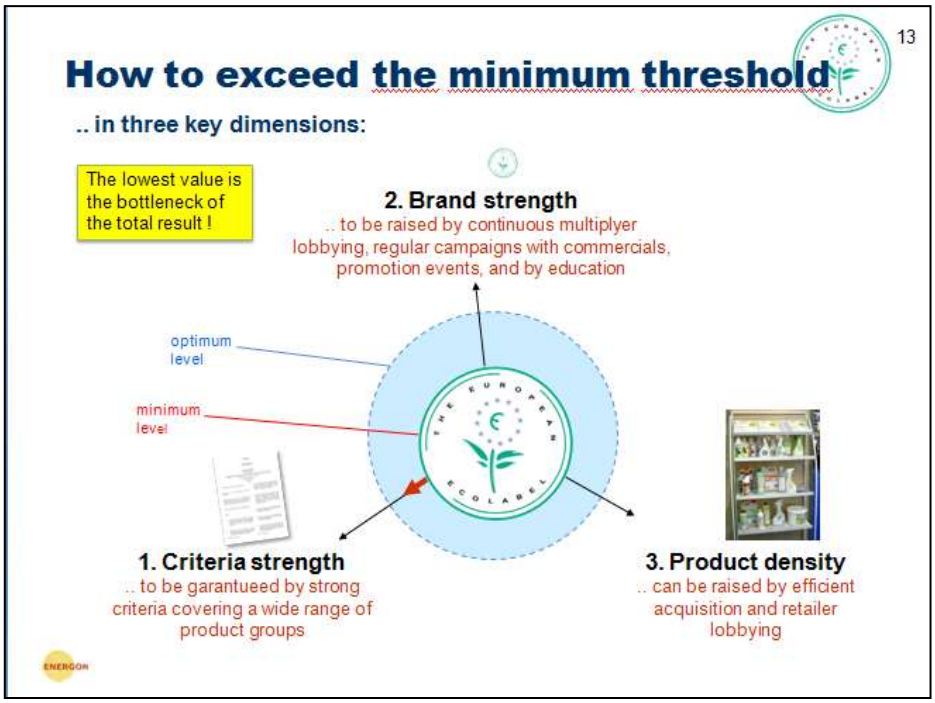
- Acquisition strategies
- Basic research and management
- Contacting of key stakeholders
- Argumentation

A Minimum Threshold

Success of an Eco-label scheme must be based

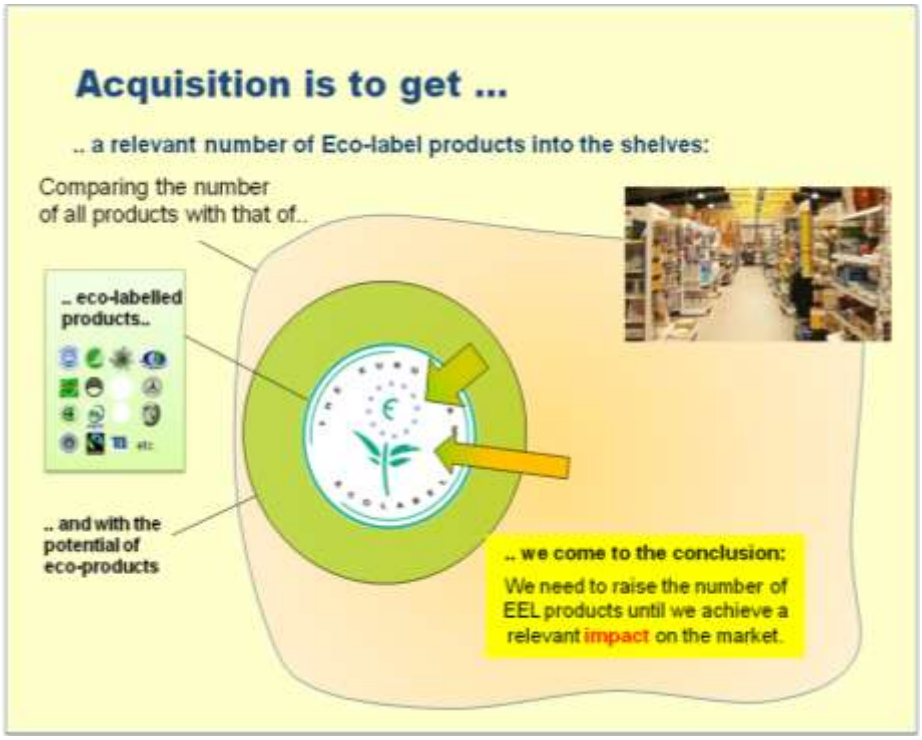
… on three dimensions

1. Criteria strength: covering a wide range of product groups
2. Brand strength: achieved with a balanced marketing-mix
3. Product density: get eco-labelled products visible in the shelves



Acquisition is to get …

… a relevant number of Eco-label products into the shelves.



A Tailored Strategy Concept

Apply a tailored mix of measures based on the specific situation.

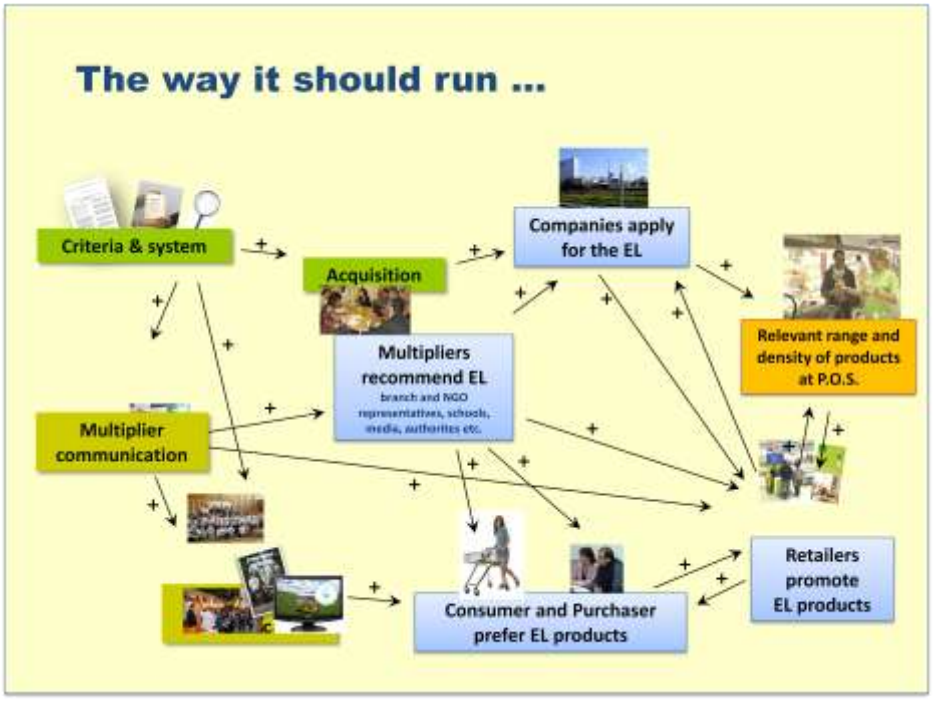
18

Tailor your strategy concept

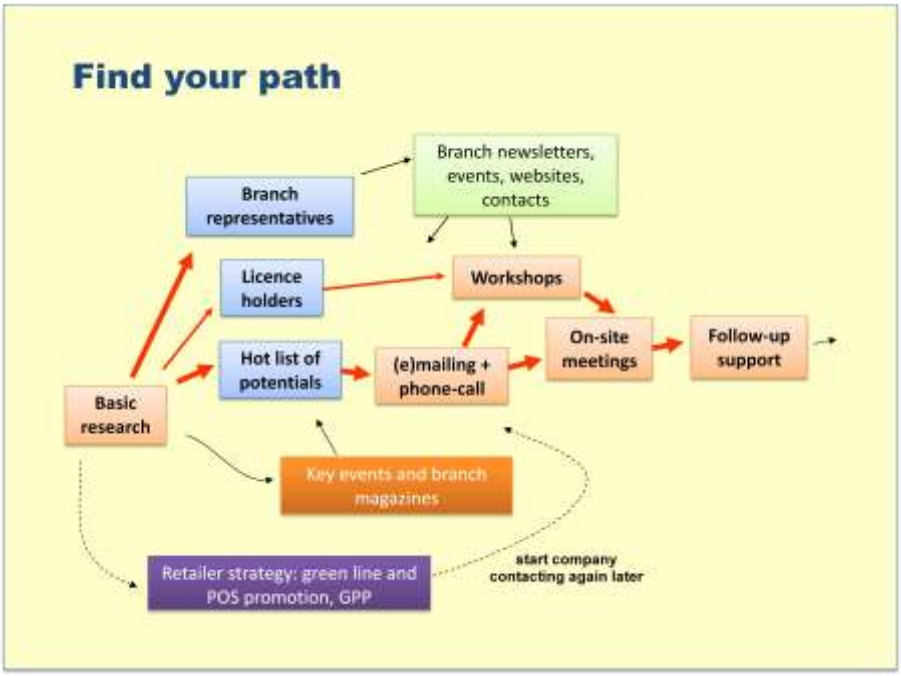
Strategy and mix of your acquisition means and measures need to be tailored to the regional situation.

If …	Then ..
.. your CB has a strong staff and differenciated mix of measures with campaigns & promotion and clear acquisition focusses and contacts ..	➢ adjust acquisition and cooperate with the CB, use the existing tools and materialsm, adjust with the planned promotion
.. the CB offers mainly administrative and technical support to potential applicants	➢ focus on tracing and contacting and convincing new applicants and then hand the contact over to the CB
.. your CB is small and just at the beginning of building up the marketing..	➢ help building up the EEL capacity and acquisition system
.. there is a national eco-label ..	➢ establish synergy with EEL: criteria harmonisation, double awarding and double marketing
.. the knowledge and recognition of EEL with industry is very low ..	➢ strengthen pull factors: win media and retailers ➢ run your first contacting rounds but don't expect to much. Next rounds will be more successful.
.. there are many licence holders ..	➢ initiate retailer campaigns and promotion and involve licence holders to keep them satisfied

The way it should run …



Find your path



Get Partners

Focus on key contacts:

- Co-operate with the Competent Body

- Win and co-operate with branch representatives

- Win and co-operate with retailers and GPP-initiators

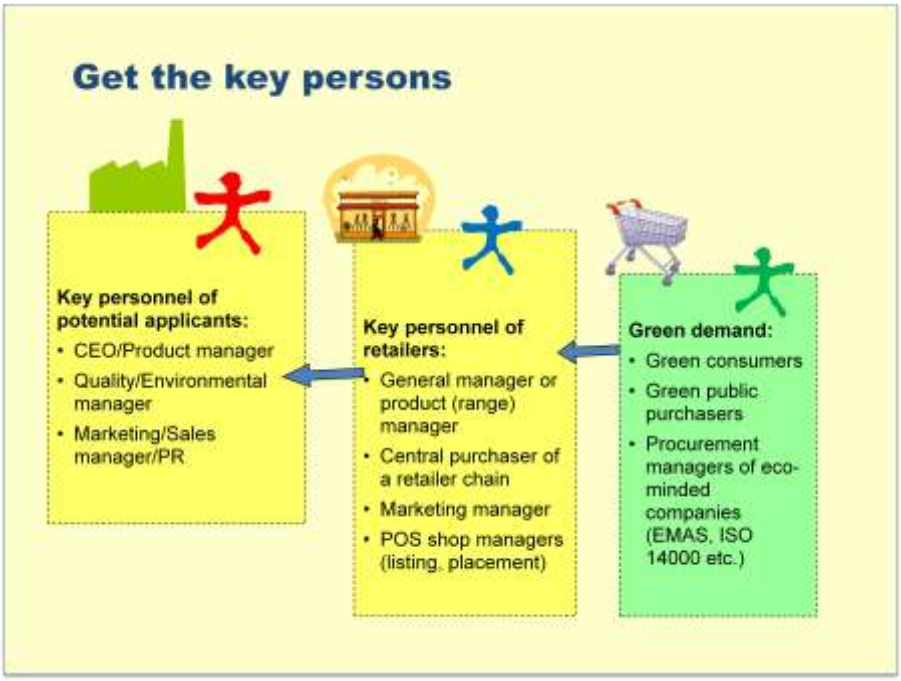
- Win key media journalists (articles on GPP-activities, new or up-dated Eco-label criteria, newly awarded products, eco-trends)

- Present at key events (fairs, congresses, branch meetings)

- Win institutions with common interests (other Eco-labels, NGOs)

- Co-operate with licence holders (best practice examples)

Source: www.euecolabel.eu



How to Approach Companies?

- Identify key players in a company (management, marketing, environmental department ….)
- Prepare key information, offers, arguments etc.
- Call to get a date
- Meet and be plausible and convincing with a clear message
- Arrange follow-up activities
- Keep in contact and set further steps
- Set a final point and get a decision

On-site Meeting

Be well prepared for meetings:

- Which are the appropriate products?
- Customers, markets, retailers, green trends
- Arguments: The idea behind the Eco-label. top quality label for international and European market, important to companies with high export share
- Who supports? EU, national Ministry of Environment, other companies (pre-product suppliers, customers, retailers), branch association
- Benefits of having the eco-label – environmental profile, keeping customers happy, chances for marketing of env. products – attracting new customers export potential, goodwill with the local authorities and citizens
- Practicalities: application process, costs, licence, logo use
- Information about other trendsetting companies with EU Eco-label
- Assistance: how and by whom?
- Synergy with other (eco)label schemes
- Questions to be expected: Read FAQs and make your own one

Tip: Exchange experiences and strategies with experienced acquisitors. Get info: Criteria (Commission Decision), Business fact sheet, general and product group consumer flyer, content of available leaflets from CB, several FAQs

Source: www.euecolabel.eu

A Handsome Contact Protocol

Optimize your records by using a well-conceived database.

Company	Date - 2007/2008	Situation/intention	Expectation/result
Best Seller -Denmark	12/2 - 5/3 -2007 1/4-2008	Contact to offer help with application regarding Asian suppliers They are investigating their Asian suppliers to determine further possibilities Follow up: Asian company suppliers to bestseller for acquisition.	Best Seller have lodged and received an Ecolabel licence for a children's range. Not sure of their future plans. 1 Indian company certified: 1 in the process.
Wernefeldt -Denmark	17/1 – 6/7 – 2007 Periodic contact from Feb-Sept -2008	Contact/meeting. Started work to certify their products. Have received some documentation including waste water. Advice on certification process	Expected to apply for a licence. Difficult to say when because the Vietnam supplier is very slow in responding to requests Vietnam company very slow/uncooperative in providing the needed documentation: Still working towards a licence
Jyden – Denmark Penfabric – Malaysia	10/1 – 6/7 - 2007	Contact to the Asian companies through Jyden (Denmark). Penfabric have lodged an application.	Penfabric are expected to get an Ecolabel licence for a range of cotton/polyester textiles.

Source: www.euecolabel.eu

7.4.4 Exercise

Goal of the exercise

This practical exercise should help participants to identify the different types of consumers who are accessible to green messages and develop a cost-efficient marketing strategy.

Agenda of the exercise

The exercise consists of two parts:

Part I: Identify different types of consumers

Part II: Develop a cost-efficient marketing strategy

Time: 25 minutes

Short presentations: 20 minutes (each group 5 minutes, each one speaker)

Method

Participants work in four groups with approx. eight “marketers”.

Each group chooses one product group.

Following product groups are possible:

Group 1: textiles

Group 2: footwear

Group 3: TV

Group 4: Paper

Each group identifies one moderator and one writer (who takes the minutes)

Initial situation for each group

Each group represents an international (or national) company who enters into a new market segment with eco-friendly products.

Try to assign roles:

- CEO
- Product manager
- Marketing & sales leader
- Environmental manager

Before starting the group work, define you products roughly:

- textiles, e.g. baby suit (made of organic cotton)
- footwear, e.g. sport sandals (long durable eco-leather)
- TV, e.g LED TV (up to 50% less energy than traditional LCD screen)
- Tissue paper, e.g. new product line for hotels (paper towels …)

Instructions

Don’t get lost in discussions on individual problems. Try to resolve the problem by finding solutions. If a solution cannot be achieved in a short time, the moderator should declare a decision.

To collect contributions from all team members please use the “card-method”. Each member gets sufficient small cards (A4/3) to formulate keywords. The moderator collects all of them and after the group discussion, the writer summarizes the main result for the final presentation of the moderator.

Part I: Identify your consumers	A successful communication strategy needs to focus on the appropriate consumers. Take into account the segmentation models mentioned in the chapter “Basics in Eco-Marketing”. Define your consumers and try to get a profile of the consumption pattern. Identify the marketplace at which consumers are getting contact with the products.
Part II: Find out appropriate marketing measures	Due to the present financial crisis the marketing budget has been cut to a minimum. Try to set up a marketing strategy based on below-the-line-marketing measures (e.g. cross-marketing co-operations, internet marketing, PR-activities …) Formulate 5 top measures (please rank!) how to sell your products best! If possible, find an emotional claim how to reach your consumers!
Final Presentation	After the group work each moderator presents the results and a short analysis of the common process as well as open (unresolved) questions. Time for each presentation: max. 5 minutes Clarify following issues: - Your consumers - Your marketplace -Your Top 5 below-the-line-measures - Your Claim
Further information or resources	Use the actual handbook and the marketing guide!

7.5 Acquisition Practical Exercise

Goal of this Exercise	Participants should experience by active involvement the atmosphere, the chances and the potential hurdles to win licence holders for an eco-label. The exercise should make them aware that not all energy and resources should be spent to develop a label scheme but that the dialogue with industry and retailers is a prominent part of the overall project as well.
Agenda of the Exercise	The 2 hours session is divided in 3 parts: 1. How to get in contact with companies: this part is presented by the moderator for “warming up” the group and introducing into the role play conducted in part 2. 2. Simulating a first meeting: In this section, the participants are taking an active part in the session by playing defined roles. 3. Conclusions & learnings: Here all are involved to assess the role play of some participants and conclusions are drawn by all and by the moderator.
Basic Principle	The introduction by the moderator is started with the basic principle underlying the acquisition of licence holders: “In most cases companies will not run for the label scheme by themselves. Don’t wait for them. It is you who has to actively approach

the companies and strategically allow them to be awarded the label."

For some state bodies or NGOs it may be unusual that they approach corporate business. To be successful however, this attitude has to be reconsidered and the organisation has to take an active part in the acquisition of companies.

Identification of Companies

The first step in the discussions with potential License holders is to develop the criteria by which companies can be identified. Such criteria could be:

- Market leaders
- Strong brand and image
- Being known as an innovator
- Having adopted CSR policies

Retailers should be considered as well as they can put pressure on the industry and can promote the eco-label (pull-strategy). At the same time retailers do have private labels and can speed up the process of developing products according to the criteria of the label and promote such products.

Identification of Persons

Next step in the identification of licence holders is to choose the right contact persons in the company. A top-management approach is recommended. The lower in the company's hierarchy you lead discussions the fewer chances to be successful. Labelling and other environmental issues are often of high interest to a company, however for a real and serious decision the commitment of the top management is needed right from the beginning. Therefore, the courage and self consciousness of the participants should be developed to approach the top management of a company first. The label scheme is a very important instrument for society and therefore the company is playing here a crucial role. So, the following hierarchy should be considered:

Departments by priority

1. CEO or board members -> top-down
2. Marketing & sales leader
3. Environmental management/quality management
4. PR/ corporate communications

First Contact

The first action is to send a letter asking for a meeting. According to the top management approach, the letter should be signed by the prominent head of an organisation and send to the CEO. The letter should mention some benefits offered by the label for the company briefly, which could be:

- Reach new consumer segments
- Differentiation to competitor
- Easier access to export markets like EU
- Easier access to procurement
- Support the Image of an innovator and eco-driver

Second Contact

The letter should be followed up by a telephone call which explains the arguments very briefly. The follow up by telephone can be a lot of work and it can be frustrating sometimes, but it is very important to stay committed to organise a personal meeting.

The Role Play: The Meeting

In the second part of this session at the beginning the set up of the role play is explained:

1. The complete group is split up into 3 teams. Each team represents the National Body of Labelling which is conducting the acquisition of licence

holders. The national label is called GREEN LABEL and it is adapted to the EU label scheme. The 2 people going into the meeting are Dr. P. Cloud, leader of the National Agency and M. Vink from the Ministry of Environment.

2. Delegates of each team will meet a company producing TV. This company is a national market leader and a large exporter to the EU. The meeting will be with Dr. Peter Smith, head of consumer marketing and David Loveland, environmental manager (those 2 persons are played by trainers).

Schedule of the Role Play

The role play is conducted in 3 steps:

1. Development of key messages for the meeting (20 minutes)
2. The Meeting (3 times, each 15 minutes)
3. Analysis of the 3 meetings and conclusions (3 times, each 10 minutes)

Key Messages Development

The first task of each of the 3 teams is to develop 3-4 key messages which will be presented to the company. Then they prepare a very short power point presentation of about 5 slides. Finally they select one speaker of the team to present the messages and one more person to join the meeting.

The moderator is coaching each group to make sure that they can produce a minimum of messages and a basic presentation.

The Meeting

The agenda of the meeting will be

- Presentation of the key messages
- Discussions with the company: answer their questions and try to persuade them
- Agree on next steps

After the presentation the 2 delegates of the company will focus on critical questions but not so much on basic information of the label scheme (as this is not specified anyway).

Critical questions will be:

1. What is the use of a national label scheme? We are a global company and need a global label.

2. What is the value of the label for us if the label is not known at the consumer level?

3. Do you really expect that we invest into the communication for the label and that our competitor will take later advantage of the well-known label?

4. It is the task of the State to make the label known. How does your communication plan and budgets look like?

5. We do not want to become a green company; we are open to all consumer interests.

6. If one or a few of our products are eco-labelled, critical consumers and NGOs will ask „why are your other products not environmental friendly as well? This just seems like green washing“.

7. In the electronic industry the product cycles are so fast, that your label scheme is out-dated very quickly.

8. What I do not like about the label is that it is not exclusive for our products. Our competitors can use it well, so what is the advantage for us?

Analysis & Conclusions

After each meeting the moderator will ask all participants about their impressions of the simulated meeting.

He will ask first the 2 delegates of the National Body for Labelling:

What do you think about your performance?

Did you persuade them?

Where did you feel strong and where weak?

Your main learnings?

Then he turns to the audience:

What were your main findings?

And then he will ask for the assessment by the 2 trainers who have played the company representatives.

Finally the moderator will give his view and will sum up the key learnings of the role play.

7.6 Case Study 1: Blue Angel, Germany

Case Study on the marketing of the world's oldest eco-label:

The Blue Angel in Germany

Basic Information about the Blue Angel

- The Blue Angel was launched in 1978 by the Federal Government of Germany
- Today 10.000 products are labelled
- in 80 product categories
- by 950 licence holders
- Awareness: 79 % of German consumers know the Blue Angel.
- 38 % of the consumers are influenced by the Blue Angel in their purchasing habits.

Who is Behind the Label

There are four institutes in Germany being responsible for the Blue Angel:

Federal Ministry of Environment

- Official holder of the Blue Angel

Federal Authority of Environment

- Develops new criteria for new product groups

Jury Umweltzeichen

- Represents all relevant groups of society
- Final decisions on new labels and the criteria

RAL GmbH

- Contracts with licence holders

The Jury Umweltzeichen

The Jury Umweltzeichen is a most relevant body to grant the Blue Angel with high credibility and neutrality. In the Jury there are representatives from the retail association, the business association, the unions, the consumer organisation, two environmental associations, the churches, German's leading test institute, the media, the science community, the association of cities and municipalities and the States.

The members of the Jury are a very important factor for the communication of the Blue Angel. Apart from the credibility those organisations have very effective networks for communicating the label's messages.

What the Label Means

The main principle of the label are:

Compared to other products, the labelled product has

- a better environmental performance
- better health protection
- superior in use and handling

Front runner principle:

Only 20–30 % of the products are able to get the Blue Angel and criteria are revised and modified after 2-3 years.

The Design of the Blue Angel for the Products

The wordings in the label say: "Blue Angel - because driven by solar energy – protects the climate"

The Design for the "Clusters"

That the consumer can get a better overview on the 80 product groups (and another 100 product groups are currently developed) 4 clusters have been created according to the main environmental or health benefit. The label says either "protects the climate", "…the resources", "…water" or "…health".

Communication Strategy 1: Lifestyles and Target Group Segmentation

The communication campaigns for the Blue Angel has focused in the past on 2 principles:

1. Target group segmentation and
2. Public-Private-Partnership for Mobilising players

To be able to segment target groups for a more effective communication the 80

product groups being labelled are allocated to certain areas of daily living. Those areas are

- garden
- office
- building and do-it-yourself
- mobility
- household, living, furniture

In a next step, target groups are allocated by socio-demographic factors and lifestyles to those areas of daily living. Relevant groups are then:

- Families with children
- Young adults/singles
- Senior citizens
- Executives in companies/public administration

Based on that segmentation, an ad campaign was designed and run in special interests magazine. There have been the following motives:

Advertisements Targeted at Office and Do-it-Yourself

Above on the left side is an ad targeting office people. It tells which labelled products are available for offices. On the right side is the ad for the do-it-yourself community which consists often of families.

Advertisements Targeted at Single Adults and Senior Citizens

On the left side there is the ad targeting singles/adults showing them which Blue Angel products are available for a modern lifestyle. The ad on the right picture is created for the area of gardening which is predominantly of interest for senior citizens.

Communication Strategy 2: Mobilising Players

Blue Angel campaigns prefer to be based on mobilisation and cooperation

- Budgets for communications are small
- Main task: motivate as many players as possible in the Blue Angel field to participate in one single campaign
- Offer one theme to all ("anniversary")
- Reach out together to the consumers to use more Blue Angel products

In those alliances there is a split of the roles of the individual players:

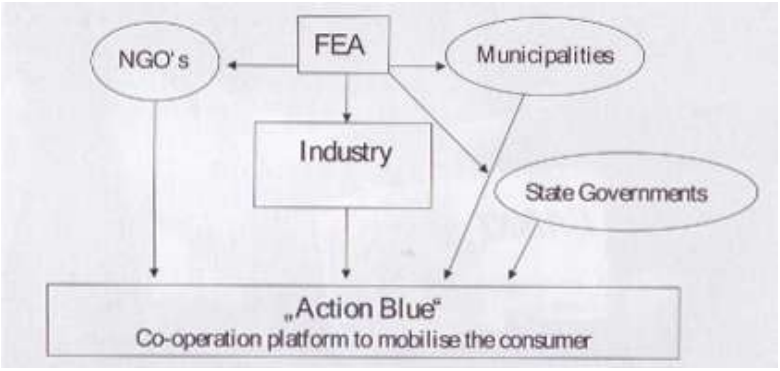
Industry's and retailers' input

- Large budgets for product communications
- Image transfer from a popular brand to the label

State's and NGO's input

- Credibility, credibility and credibility
- Individual communication channels
- Mobilisation of members for events

The network of the Blue Angel is broad:



Example of a Typical Blue Angel Campaign: "Action Blue" at the 25th Anniversary

25th anniversary campaign:

- Photo promotion: A maximum of consumers to be photographed with a Blue Angel product in shopping malls, town halls, etc.
- Action Blue became a central platform for cooperation and mobilisation
- Final event in Berlin with Federal-Minister
- Vast media coverage of many local events and national event.

The platform has been used for own events by a large number of municipalities and State Governments.

Furthermore, the campaign was supported by licence holders which conducted own events, media campaigns and POS events.

Another Example of a Typical Blue Angel Campaign:

The platform for the 30th anniversary campaign was a road show based on a bus (sponsored by Mercedes Benz being labelled with the Blue Angel) including a video studio where consumers were asked to make a video and take place on "the longest blue sofa of the world" on the internet.

The road show events were on 50 days in different cities. Municipalities and

"Action 30 Years Blue Angel"

NGOs were supporting the events gaining vast local media coverage.

At the same time retailers and industry were conducting promotions and POS events connected to the road show with the bus.

There were vast media coverage of many local events and national event.

Summary

Small budgets should be used to mobilise as many players in the sustainable field as possible.

Offer an umbrella event as a platform

- where companies, NGOs, etc can participate easily and make individual and modified campaigns
- which is attractive to the consumers (emotional) and
- which can be covered by the media.

7.7 Case Study 2: Leiner, AT: The Green product line

"Peaceful 2-gether"

Retailer Marketing with the AT and EU Eco-label

Introduction

Within the framework of a long-term marketing contract on behalf of the Austrian Federal Ministry of Environment, one of the most relevant retailer in the home and furnishing sector, Leiner GmbH in Austria, was convinced to use the Austrian and European Eco-label as a strong marketing instrument in a specific product range, called "Grüne Linie". This success story demonstrates that marketing needs a complex mix of measures and has to be planned over a long period.

The main features of this ongoing co-operation are:

- Both labels − EU-wide and national − work peacefully 2-gether without competition

- The retailer is an excellent partner for marketing co-operation

- The retailer turns out as perfect address to find new license holders

- Training workshops have been very important to inform and motivate employees

- The marketing co-operation has been planned as win-win-strategy (efforts and success for both partners)

- less financial input by Competent Body

Features of "Grüne Linie":

- Clearly marked product segment

- Female consumers

- Exclusively high quality products (Furniture, textiles, mattresses etc.)

- All products must have an Eco-label (suppliers)

- Started to mark products from different suppliers with own brand "Grüne Linie" (supplier brand is not visible)

- The retailer Leiner is licence holder with some textile products

- Excellent consumer advice by sales staff

- Professional Customer Relationship Management

- Higher price level

- Separate web presence: www.diegruenelinie.eu

Logos Leiner, Green Line	Die grüne Linie	Leiner
Logo Austrian Eco-label		
EU Flower		
Description AT Eco-label	Awareness: 54 % Established: 1990 Labelled products: appr. 650	Awareness: 14% Established: 1991 Labelled products in AT: appr. 40

Ladies' Days

Ladies Days at Leiner, March 2007

A first common activity took place on two days in all outlets with Eco-label-promotions: product presentations, consumer quizzes (quiz-games with a wheel of fortune) etc.

Marketing approach:

An on-site research among Leiner consumers has shown that women are open-minded and in favour of quality and environmental issues, e.g. they take care about quality labels on the products packages far more than male consumers. For that reason, the marketing department decided to organize specific "Ladies Days" twice a year.

Main marketing issues:

- Health for women and
- Environmental aspects.

Figures & facts:
- Twice a year two or three days promotion at all outlets
- Austrian-wide in 17 Leiner outlets
- Experts advice in Relax-Lounges provided by Eco-label-marketing team in all outlets
- Up to 50.000 visitors
- Long-term announcing in media (with paid ads)
- Strong POS-presentation
- Appr. 4.000 participants at product presentation and quiz games
- Estimated costs of the campaign (Leiner: up to € 1.000.000,-; Austrian Ministry € 15.000,-)
- Advertising value for the Eco-label: approx. € 150.000,-

Both logos (EU and AT) are present at the stores.
Photo credit: Ernst Leitner, Leiner Ladies Days

Retailer Promo

In Spring 2008, a promotion took place in the Flagship store in Vienna, AT, at several days with following activities:
- Promotion headline: Wellness and Environmental Days at Leiner
- Mystery-rally through three floors:

  # Textiles (Lenzing, EU Eco-label)
  # Furniture (Team 7, AT Eco-label)
  # Mattresses (Joka, AT Eco-label)

Photo credit: Ernst Leitner, Leiner Wellness Week

Train-the-Trainer Workshop

During a one-day workshop the internal product trainers of Leiner could be informed and trained about all aspects of the Austrian and EU Eco-label:

- Criteria of relevant product groups
- Consumer benefit
- Environmental aspects
- Consumer surveys, relevant marketing data

A lot of checklists, fact sheets, PowerPoint slides etc. could be provided to the trainers for replication.

Acquisition

For many years Leiner has offered a special product line under the brand “Grüne

Linie". During the marketing activities Leiner could be convinced to adopt the AT and EU Eco-label on all products within this range. The consequence: all suppliers have been forced (!) to apply for one of both labels. Otherwise they would lose the listing-contract. Meanwhile (2009) most companies applied for the Eco-label (AT, EU).

POS-Mix

A further success could be realized for the brand marketing: Leiner started to put the Eco-label logo (AT, EU) on

- all product catalogues, folders and flyers
- paid ads, direct mail advertising
- bulk mails

The eco-labels are also found at the POS:

- Price tag
- Flags, crowners etc.

The co-operation with Leiner generates a very high marketing benefit for both Eco-labels:

- Strong impact on the brand recognition
- Excellent cost-benefit-ratio
- Long-term effect
- Pushes companies to apply for the Eco-label!!!

Example: Tag with the message: " I am certified"

Photo credit: Leitner

Contacts for Further Information

Federal Ministry of Environment, Department for industrial environmental protection

Competent Body for the Austrian and European Eco-label in Austria

Att. Dr. Regina Preslmair, regina.preslmair@lebensministerium.at

1030 Vienna, Stubenbastei 5, Austria

www.umweltzeichen.at

www.diegruenelinie.eu

8 Module D: The Role of Government and Consumer Organizations

8.1 Introduction

Learning Objectives

The participants will:

- learn which tools and policies could help to promote eco-labelling
- be able to provide governments and consumer organizations with advice on how to promote eco-labelled products with other policies and tools.

Programme

The programme will be structured as follows:

- 14:30 – 14:45 Introduction
- 14:45 – 16:00 Green Public Procurement
- 16:00 – 16:15 Coffee Break
- 16:15 – 16:45 Economic Instruments
- 16:45 – 17:15 Education for Sustainable Consumption
- 17:15 – 17:45 Consumer Organizations
- 17:45 – 18:30 Wrap-up

8.2 Promoting through Sustainable Procurement

8.2.1 Introduction

What is Green Public Procurement (GPP)

Green Public Procurement (GPP) (and to some extend also Sustainable Public Procurement – SPP) is identified as political response and strategic field to meet the challenge of sustainable development and to further encourage sustainable consumption and production. GPP could be understood as process

> "whereby (private or public) organizations meet their needs for goods, services, works and utilities in a way that achieves value for money on a whole life basis in terms of generating benefits not only to the organization, but also to society and the economy, whilst minimizing damage to the environment."

GPP contributes to a wide range of environmental issues, like climate change and energy efficiency, waste and recycling, transportation, sustainable construction, organic food, but also to social issues, like labour standards, fair trade, and gender equality.

Difference between Green and Sustainable Public Procurement

Normally, there is a clear distinction between GPP and Sustainable Public Procurement (SPP). The difference between GPP and SPP are:

- Environmentally responsible or 'green' procurement is the selection of products and services that minimize environmental impacts. It requires a company or organization to carry out an assessment of the environmental impacts of a product at all the stages of its lifecycle. This means considering the

environmental costs of securing raw materials, and manufacturing, transporting, storing, handling, using and disposing of the product. Environmental considerations might include: the reduction of greenhouse gas emissions and air pollutants; improved energy and water efficiency; reduced waste and support for reuse and recycling; use of renewable resources; reduced hazardous waste; and reduced toxic and hazardous substances.

- In addition to environmental concerns SPP also incorporates social considerations, like gender and ethnic equity; poverty eradication; and respect for core labour standards.

European Union's Definition on GPP

As outlined by the European Commission, Green Public Procurement (GPP)

"(…) is a process whereby public and semi-public authorities meet their needs for goods, services, works and utilities by seeking and choosing outcomes and solutions that have a reduced impact on the environment throughout their whole life-cycle, as compared to comparable products/solutions. A procurement procedure will be considered as 'green' only if it has led to the purchase of a substantively 'greener' product and only if the environmental characteristics of this product go beyond what needs to be complied with on the basis of European or national environmental legislation."

Public Authorities Should Lead

Facing the political need to further integrate environmental policy into all governance, public authorities should be in the lead to setup measures on sustainable development in their own operations and to create opportunities for a better uptake of environmental friendly technologies, products and services, and to stimulate the widespread application of SCP practices in business and the general public.

The European Union and GPP

Beside UNEP, OECD and others, it is widely recognized, that the European Union is one of the frontrunners to implement GPP policies and measurements. Here, several policy frameworks and supportive measures were setup to stimulate the broad application of GPP practices within Member States. Within the European Union there is a wide variety of approaches used by Member States, taking into account the different framework conditions of implementation.

Studies show clearly, that the level of implementation is not equally distributed throughout the European Union: 7 countries out of 27 Member States successfully implement GPP on a broader scale and perform over average. Furthermore, there are still several obstacles and constraints in place which hinder the wider uptake of GPP practices in the Member States, like lack of policy support, lack of information and technical capacities.

Therefore, there is a further need on guidance, training, capacity building and practical tools on the various levels of GPP implementation, and still a need for a better integration of GPP into general procurement practices and training.

Establishing the Framework for GPP

Beside the policy design to setup the right framework condition it is important on how to integrate environmental considerations into the procurement procedure and to get an insight view on the various possibilities to operationalise this challenge by considering also the legal obligations. Here, the procurement procedure is highlighted and outlined in more detail.

Eco-labels and GPP

Within GPP, eco-labelling can play an important strategic role to help the widespread and better application of GPP. Within the existing legal framework eco-labels could be used as baseline to outline and to comply with the technical specifications within the tendering process. Additionally, eco-labels could be used as some kind of „door-opener"

to raise awareness among politicians, companies, and the general public, and helps to build strategic focus to setup policies and measures in a cost-effective way.

Guidelines and Tools Provided by the European Commission and Member States

To overcome various obstacles and constraints, the European Commission and Member States provide a pool of knowledge (guidelines and specific tools) to re-orientate public procurement to be more sustainable and to build strong networks for better exchange of information on good practices related to the different stages of the procurement process. This pool of knowledge and experience could be also used to further mainstream GPP practices also in non-European countries.

Learning Objectives

The learning objectives of the section are to provide a basic understanding of the strategic role of green public procurement to promote sustainable consumption and production practices and to introduce the practical functioning of procurement procedures and applications. Special attention will be given to the linkage of eco-labelling and the procurement process.

Content

The learning unit on Green Public Procurement provides:

- overview of GPP policy frameworks, objectives and benefits
- key elements of the GPP concept and procedures
- overview on the level of GPP implementation within the European Union
- reflections on various obstacles and constraints related to GPP implementation
- basic information on the strategic role and the legal requirements for the use of eco-labels in GPP
- some examples of good practices.

Basic Reference of Information

Please visit the European Commission's website on GPP which provides extensive information and practical guidance:

http://ec.europa.eu/environment/gpp/index_en.htm

8.2.2 The Potential of GPP to Promote SCP Implementation

Introduction

Public Authorities – Major Consumers

Public authorities are major consumers in Europe, spending some 16 % of the EU's Gross Domestic Product (which is a sum equivalent to half the GDP of Germany). By using their purchasing power to opt for goods and services that also respect the environment they can make an important contribution towards sustainable development.

Green Public procurement covers areas such as the purchase of:

- energy efficient computers and buildings,
- office equipment made of environmentally sustainable timber,
- recyclable paper,
- electric cars,
- environmental friendly public transport,
- organic food in cantines,
- electricity stemming from renewable energy sources,
- air conditioning systems complying with state of the art environmental solutions.

GPP as Example in Marketplace

GPP is also about setting an example and influencing the market-place. By promoting green procurement, public authorities can provide industry with real incentives for developing green technologies. In some product, works and service sectors the impact can be particularly significant, as public purchasers command a large share of the market (in computers, energy efficient buildings, public transport, and so on).

Finally, if considering life cycle costs of a contract, GPP allows to save money and protect the environment at the same time (like save materials and energy, reduce waste and pollution), and encourage sustainable patterns of behaviour.

Potential Environmental Benefits and Impacts of GPP

EU's Potential of Environmental Benefits from GPP

Studies show clearly the environmental benefits if GPP were to be widely adopted across the European Union:

- If all public authorities across the EU demanded green electricity, this would save the equivalent of 60 million tonnes of CO_2, which is equivalent to 18% of the EU's greenhouse gas reduction commitment under the Kyoto Protocol. Nearly the same saving could be achieved if public authorities opted for buildings of high environmental quality.
- If all public authorities across the EU were to require more energy-efficient computers, and this led the whole market to move in that direction, this would result in 830.000 tonnes of CO_2 savings.
- If all European public authorities opted for efficient toilets and taps in their buildings, this would reduce water consumption by 200 million tonnes (equivalent to 0.6% of total household consumption in the EU).

Facts from Studies in EU

Beside these potentials, an in-depth study on the environmental and economical benefits of GPP within the best-performing Member States (UK, Germany, Austria, Sweden, Denmark, Finland, Netherland), launched by the European Commission in 2008 and published in 2009, shows, for example, that:

- GPP contributes to an average reduction of CO_2 emissions of 25% in 2006/2007 when purchasing green for the ten product groups subject to this study. The average CO_2 emissions impact in 2006/2007 varies from -9% in Germany to -47% in the Netherlands, depending on the country-specific levels of GPP per product group. The study shows that for most product groups, GPP results in a reduction of CO_2 emissions, where construction, gardening, paper and textiles attaining the highest reduction percentages. This means that public purchasers have the possibility to substantially reduce CO_2 emissions through GPP.
- The use of environmental criteria in procurement procedures can lead to higher direct purchasing costs, but it can result in an average decrease of overall costs for public organisations of around 1%. The reason behind this is that higher purchasing prices of green goods are compensated by lower operating costs. The study concludes that there are mainly two product groups leading to cost reductions through GPP: construction and transport.
- Combining environmental and financial impacts on the product level, only for transport, construction and comprehensive green cleaning services, both the CO_2 impact and the financial impact are negative. These are the product groups that public purchasers could focus primarily on when implementing GPP.

Reference

The study is available under: http://ec.europa.eu/environment/gpp/study_en.htm

8.2.3 The Political Context of GPP

World Summit on Sustainable Development 2002

Public procurement was identified at the World Summit on Sustainable Development of 2002 as one important instrument for stimulating more environmentally sound goods and services. It was recognised, that achieving sustainable development at all levels of governance cannot be established if there is no integration of the environmental dimension into all other policy areas, through the proper implementation of environmental policies by increasing the use of various approaches and instruments. Therefore, GPP is specifically mentioned

in the Plan of Implementation, which encourages "relevant authorities at all levels to take sustainable development considerations into account in decision-making" and to "promote public procurement policies that encourage development and diffusion of environmentally sound goods and services".

OECD Council Recommendation

In the same year, the OECD Council issued a recommendation on improving the environmental performance of public procurement which recommended that member countries take greater account of environmental considerations in public procurement of products and services, and take concrete steps to ensure the incorporation of environmental criteria into public procurement.

International and Regional Organizations Involved

Various international and regional organizations and networks have been active in promoting sustainable public procurement through awareness-raising, toolkit development and capacity-building activities. Those include among others:

- the OECD and the European Commission
- the Japan-based organisation IGPN (International Green Purchasing Network), launched in 2005
- ICLEI (Local Governments for Sustainability), an international association of local governments and national/regional local government organizations
- the North American Green Purchasing Initiative of the Commission for Environmental Cooperation (CEC NAGPI)
- the Marrakech Task Force on SPP
- the United Nations Environment Programme (UNEP)
- the International Labour Organization's International Training Centre (ILO/ITC).

EU Policy Frameworks for GPP

The European Union is one of the frontrunners to promote GPP implementation as a response to the challenge of sustainable development (most of these policy frameworks were already explained in detail in module A):

- EU Sustainable Develoment Strategy (EU SDS)
- Sixth Environmental Action Programme (6th EAP)
- In its Interpretative Communication of 4 July 2001, the European Commission set out the possibilities offered by Community law to integrate environmental considerations into public procurement procedures. The Court of Justice further clarified those possibilities.
- In 2003, the European Commission adopted a Communication on Integrated Product Policy (IPP), which recommended that Member States increase the level of GPP and elaborate national action plans that set targets and outline the concrete measures to implement this policy.

Public Procurement Directive

The public procurement directives adopted on 31 March 2004 consolidate and complement the legal context. They specifically mention in their recitals and provisions the possibilities for adopting environmental considerations in technical specifications selection and award criteria, and contract performance clauses. Although the directives apply only to public procurement contracts whose estimated value is above certain thresholds (as mentioned in the directives), the Court of Justice has ruled that the EC Treaty principles of equal treatment and transparency, as well as the free movement of goods, the freedom of establishment and the freedom to provide services also apply to contracts under these thresholds.

EU Sustainable

In the renewed Sustainable Development Strategy adopted in 2006, the leaders of

Development Strategy

the European Union (EU) have set forth a target for Green Public Procurement (GPP), stating that, by the year 2008, the average level of GPP should be at the current level of GPP in the best performing Member States.

EU Action Plan on SCP and Communication on GPP

With the launch of the EU Action Plan on SCP/SIP in 2008 the European Commission reaffirms the commitment to further strengthening GPP implementation on the European level and within Member States, specifying measurements to be taken in a Communication adopted on 16 July 2008, in which the European Commission proposes a 50% target for each Member State to be reached as from 2010.

References

Please find further information on the various activities of the mentioned institutions:

OECD: http://www.oecd.org/document/21/0,3343,en_2649_34281_37414933_1_1_1_1,00.html

ICLEI: http://www.iclei.org/

UNEP: http://www.unep.fr/scp/procurement/docsres/

EU: http://ec.europa.eu/environment/gpp/index_en.htm

8.2.4 Strategic Elements of the Concept of GPP

Introduction

Beside various definitions and policy frameworks on GPP, there is no single approach of GPP in place that covers all aspects of GPP in a consistently way. However, there are some common key elements and characteristics which should be considered as part of a general GPP approach.

Strategic Elements to Promote GPP

Important strategic elements to promote GPP are:

- setup of an environmental policy for public procurement
- integrate GPP as means of implementation in other policy frameworks
- setup of an action plan on GPP to further specify priorities and fields of action (sectors, products and services)
- develop the needed legal framework and administrative capacity
- identify and develop specific tools for implementation and capacity building (guidelines, administrative procedures, training, toolkits, websites, basic and specific information materials)
- setup of complementary measurements and incentives (campaigns, economic measurements)
- indicator development, statistics and reporting
- research on obstacles and success factors
- pilot projects.

Clear Political Mandate Needed

Due to its legal, institutional and fiscal/budgetary obligations GPP needs a clear political mandate and a strong institutional foundation to ensure proper implementation. Related to the legal and political system, therefore, GPP requires strong co-ordination and cooperation between various ministries (interior, finance,

and environment) and levels of implementation (federal, municipalities, local).

8.2.5 Status of GPP Implementation in the European Union

Implementation by European Commission

Studies in Member States

The European Commission launched several studies on the status of GPP implementation on the European level and within Member States.

The main objectives of these studies are:

- measure the level of GPP implementation and application in the Member States
- identify main obstacles and needs
- provide good practices
- make examples available for environmental specifications for products and services most suitable for „greening“.

European Commission Awareness Raising

As proposed by the various policies in the field of IPP/SCP and based on the outcomes of several consultations with Member States and studies the European Commission has setup a broad range of measurements to further raise awareness on the benefits and to increase the level of implementation of GPP in the Member States. Furthermore, the European Commission starts to integrate GPP practice more systematically in its own procurement procedures and to increase the application of EMAS by all Commission bodies.

Key Issues for European Commission

Based on the identified obstacles related to a more successful uptake of GPP within Member States, the European Commission put emphasis on the following issues:

- further development of the legal framework
- develop practical guidance on how to better integrate GPP into public procurement
- develop a toolkit on the technical specification for the environmental performance of products and services to be used in the tendering based on EU eco-label criteria where available
- develop tools for information exchange (website) and data base on GPP practices and user instruction
- develop and provide trainings to the Member States
- provide networking opportunities between Member States
- support demonstration projects
- launch studies on various aspects on GPP, like progress monitoring, life cycle costing, legal requirements, technology procurement, and best practices.

The outcomes of these activities are freely available at the Commission's website on GPP and could be also helpful for the implementation of GPP in non-European countries.

Key Product Categories for the European Commission

Based on various analyses on the environmental and financial impacts and benefits and other criteria (like best practices, availability of alternatives on the market), the European Commission emphasizes the need to focus activities on the following product categories:

- Construction work
- Transport
- Cleaning products/services
- Clothing

- Electricity
- IT devices
- Catering&Food
- Gardening
- Paper
- Furniture

The European Commission intends to subsequently widen up the spectrum of product groups, to which the European Commission will provide additional support and information.

Implementation within the Member States

Surveys

The European Commission launched several studies to measure the level of GPP implementation in the Member States and to find and communicate best practices and best methodologies and strategies in order to enable more GPP in Europe. Due to some lacks on the statistical information, the studies are mostly based on surveys among Member States which provide not a full picture of implementation, but give however a broad indication of existing tendencies and performance in the field of GPP.

Take 5 Study

Based on the „take 5“ study (performed on the basis of responses to 860 online questionnaires and by analysing the use of environmental criteria in more than 1000 tender documents) launched by the European Commission the findings of the level of GPP implementation in the EU Member States could be categorised as follow:

- GPP performance of countries
- barriers to GPP and
- differences in GPP by product.

GPP Performance of Countries

The level of implementation could be summarised as follow:

- The study highlighted that there are 7 countries in the European Union (Austria, Denmark, Finland, Germany, Netherlands, Sweden and UK: the so called ‘Green-7’) that consistently have more tenders with green criteria than the ‘Other-18’.
- Respondents from these countries rated their GPP activities more highly on the questionnaires.

The Green 7

The ‘Green-7’ exhibit some or all of the following characteristics:

- Strong political drivers and/or national guidelines.
- National programmes: GPP has been the subject of a national programme and the issue has been addressed for a number of years.
- Information resources: all have GPP websites and information resources available (often containing product related criteria and specifications).
- Innovative procurement techniques: 60% of questionnaire respondents from the ‘Green-7’ are using the following tools: life cycle costs as an award criterion, functional specifications / request for environmental variants; compared with 45% from the Other 18.
- Implementation of environmental management systems (EMS) by the purchasing organisation: 33% of the questionnaire respondents of the ‘Green- 7’ stated that they had an EMS which addressed GPP compared with 13% from the other 18 countries. The implementation of EMS by public bodies would indeed provide the necessary managerial support to GPP.

Results of In-depth Studies

Based on a more in-depth study (2009) on the current status of GPP implementation in the best performing Member States, efforts undertaken by the Green-7 have lead to an average overall level of 45% 'green' of the total procurement value (indicator 1) and 55% 'green' of the total number of contracts (indicator 2) in 2006/2007. On indicator 1 the UK is the best performing country, scoring a percentage of 75% on GPP, while the Netherlands scores lowest with 27%. On indicator 2 Austria performs best with 62% and Germany comes last in line with 46%. Differences in percentages between the indicators can be explained by the fact that within indicator 1 a high value contract is of greater weight than a low value contract. (Further statistical material is provided in the readings)

Main Barriers to GPP

The results regarding the main barriers to GPP are:

- Green products would be more expensive (44%); the perceived additional costs associated with greener products are seen as a strong barrier in all the countries.
- Lack of environmental knowledge (35%); lack of information and tools are also rated highly however in the 'Green-7' this was felt to be less of a barrier.
- Lack of managerial and political support (33%); the high percentage stating that lack of management support is a barrier shows that senior officials within the public sector across Europe do not have a high awareness of the importance of the GPP agenda, or their awareness is not explicit to their purchasing staff.
- Lack of tools and information (25%)
- Lack of training (25%).

Differences in GPP by Product Groups

In the take 5 study, tenders for various product groups have been analysed to verify the use of environmental criteria. These criteria were then categorised as either 'light green' (1-3 clear environmental specifications) or 'solid green' (more than 3 clear environmental specifications).

The findings stated clearly, that within the so called „Green 7" the spread of solid green criteria related to the various products exceed more than 50% compared to the average of all Member States of 10-20%.

Some product groups are more suitable for greening than others. Professional services such as advertising, general management, research and auditing services seldom contain environmental criteria whereas furniture, construction etc. often do.

The different levels of GPP between certain products are considerable.

Implementation Issues

Based on the tender document analysis and the feedback to the questionnaire given by the Member States there are some additional tendencies in relation to the quality of implementation which could be summarised as follows:

Unclear Specifications and Criteria

A large number of tenders analysed – regardless of the product group – did contain references to the environment. However these criteria and references were not well defined and it would be unlikely that they would result in a greener purchase. An example of an unclear environmental specification would be a tender stating that: "packaging should be from environmental friendly material" (without further specifying which materials should be considered environmental friendly).

Structure of Tender Documents

Another general observation is, that the structure of tender documents varies considerably, and that some documents are rather confusing, containing 'scattered green elements': It is often hard to identify what are the selection criteria (obligatory requirements related to the financial and technical capacity of the bidders) and what are the weighted award criteria (which relate to the bids themselves and against which the bids are compared one against the other in order to choose the one presenting best value for money). It also seems that public purchasers often mix up these criteria.

Differences between Tender Analysis and Answers given in the Questionnaire

It is clear that organisations perceive that they are implementing GPP more than they are actually doing it: 67% of all questionnaire respondents perceive that they use environmental criteria when purchasing, while in reality only 36% of the tender documents of all 25 Member States actually contain environmental criteria. Only two 'very green' Member States (Sweden and Germany) include green specifications in just over 60% of the analysed tender documents.

Criteria related to the Compliance with European Union Legislation

These are environmental specifications and criteria which are clear and objective and will normally lead to actual green outcomes. The in-depth analysis identified the need for further guidance, information, training and tools. Indeed, although many of the tenders, although initially marked as 'green' because of the inclusion of some environmental criteria, were not in fact fully compliant with these European Directives (lack of clear and transparent criteria, use of unlawful selection or award criteria, frequent confusion between selection and award criteria etc.).Although, it has been very difficult to identify 'perfect green' tendering procedures. This again highlights that there is a considerable need for training, not only of GPP, but also about public procurement in general. GPP should be usefully integrated into general public procurement training.

Examples

Example: A recurring example of non compliance with the European Directives is that EMS are often requested either as selection or award criteria. This is not allowed because the public procurement directives request that there must be a link between selection and award criteria on the one hand and the object or service or work purchased on the other hand.

Example: Another recurring mistake in GPP is the lack of transparency as regards the way in which the tenders will be assessed against the award criteria set forth (lack of weighing and often also lack of clear award criteria).

Example: Another frequent mistake is that tender documents refer to national eco-labelling schemes, without recognizing equivalent specifications or eco-labelling schemes. Although often these practices will have led to purchasers buying environmentally sound products, they cannot be promoted as best practice because of the lack of legal compliance.

Other Obstacles

Several other studies show, that there are a quite number of additional obstacles in relation with the implementation of GPP. These could be:

- Budget system and accounting practice: The budget and accounting frameworks under which public institutions operate, which differ between (and often within) countries, can lead to economic inefficiencies in public expenditure management. Commonly encountered obstacles to more sustainable procurement decisions include single-year budgeting as well as the limited ability to carry over funds from one fiscal year to the next and to retain efficiency savings. The former exacerbates the focus on short-term outcomes and leads to discriminating against products with lower life-cycle costs but higher upfront costs; the latter limits the incentive to investigate trade-offs among resource inputs and make

investment decisions accordingly.

- Supply constraints: For individual countries, the supply side may be a key barrier to implementation because at least some domestic industries will have to undergo significant upgrading before a GPP policy can be put in place. For instance, a government will require that all paper purchased by public agencies have at least 50% recycled content, but there is currently not enough local supply of such paper.

Reference

Results of the studies are available under:

http://ec.europa.eu/environment/gpp/studies_en.htm

8.2.6 The Strategic Role of Eco-labelling within GPP

Linkages Between Eco-labelling and GPP

There are clear inter-linkages between eco-labelling and GPP in various aspects. As developments on the implementation of IPP/SCP in Member States show, that the level of GPP implementation is strongly correlated to the institutionalisation or absence of a national eco-label scheme. Beside the UK, all the other Green-7 countries mentioned in the take 5 study have installed successfully national eco-labelling schemes which generally served as starting point to develop also national GPP policies and programmes.

German Blue Angel Example

In Germany, there is a clear indication on this correlation, because the introduction of the Blue Angel in 1978 was the starting point for nearly all relevant policies on products and sustainable consumption.

This development is underlined through the fact, that the competence gathered within the development of the eco-label was transferred into a wider competence of GPP application. Therefore, capacity building on eco-labelling is at least a core element towards a capacity building on GPP, starting with the products in place covered by the eco-label.

From an economical point of view, the public investment which is spend for the creation of an eco-labelling scheme could be used also for the needed public investment for GPP (criteria development). Requirement for this synergy is that the development of eco-label criteria should anticipate the special needs and requirements of GPP (e. g. synchronisation of information). Due to the presence of an eco-label scheme the hurdles to step in GPP could be seen as lower, because networks and institutional procedures are already in place to some extent.

Complementary Promotion of Eco-labels and GPP

Complementary, activities on the promotion and marketing of eco-labels (like information tools, campaigning) could be easily used in awareness raising activities within GPP. Today, purchasers are one of the primary target groups for these activities (integrative marketing strategies). Related to the product portfolio of some of the national eco-labels, like in Germany, the strategic development of the eco-label's portfolio was directly target to the application within procurement (like construction sector, public transportation).

Experiences show also, that the presence of an eco-label may create additional demand by its own (e. g. similar characteristics of products and technologies that can be easily adapted).

Eco-labels as Foundation to

Related to the fact, that GPP implementation is often lacking political support, the presence of an eco-label scheme builds the foundation to raise the awareness

Raise Awareness

and support of policy makers to invest in GPP implementation (eco-label as model for governance). This synergy comes into reality, when integrating stakeholders already in the work of the eco-label scheme (eco-labelling board), like municipalities.

This institutional arrangement helps also to take up important new aspects of environmental policy, like the question on a common methodology of a carbon foot print approach of products, or the integration of social criteria, which is also increasingly demanded by public purchasers. Here, research on a better integration of such aspects could be used as reference for the further development of both, eco-labelling and GPP.

Practical Functions of Eco-labels

The most important strategic factor for the increased use of eco-labels within GPP could be seen in their practical functions related to the procurement procedure:

- help to draw up technical specifications in order to define the characteristics of the supplies or services
- check compliance with these requirements and
- create benchmarks.

The application of eco-labels within the procurement procedure will be explained in more detail under 8.2.8.

Reference

Information of the linkage between the EU eco-label and GPP is available under: http://ec.europa.eu/environment/eco-label/about_eco-label/eco-label_and_gpp_en.htm

8.2.7 From GPP Policy towards GPP Implementation

Getting Started

In principle, it should be fairly easy for all public authorities to take the political decision to buy green. Indeed, they should be encouraged to do this as it will not only benefit the environment but also the contracting authority by improving its public image or create „best value for public money“. In fact, a green purchasing policy does not normally require any structural changes by the contracting authority. On the other hand, the setup of a GPP policy does not automatically leads to the proper implementation of GPP, while institutional capacities are lacking.

Therefore, a number of instruments and tools that can facilitate the transition to GPP practices have become available. In particular, toolkits developed by organizations such as the European Commission and others can provide practical guidance to countries interested in implementing green procurement policies. Also the Marrakech Task Force on SPP has developed toolkits and training materials for SPP that follow a step-by-step approach.

Planning

As stated in several guidelines on GPP (e. g. like the Commission's handbook on GPP published in 2006), therefore, putting GPP policy into practice will first require some strategic planning:

- assessment of the current state of affairs
- organising appropriate training for purchasing staff
- ensuring access to environmental information
- setting priorities when choosing the contracts most suitable for “greening”, and
- assessment of the needs and objectives

Once this is in place, contracting authorities will then be able to proceed with the

proper organisation of a green public procurement procedure.

Assessment of the Current State of Affairs

The starting point should be to conduct an assessment of the current state of affairs — in terms of the existing legal framework, the nature and magnitude of public expenditures and their key sustainability impacts, and the market availability of sustainable products and services at competitive prices.

Assessing Training Needs and Ensuring Access to Environmental Information

Lack of knowledge and managerial/technical capacities are some of the major bottlenecks towards a better implementation of GPP. Therefore, most of the policies in place proposing training and capacity building measures to match these demands:

- The staff making the purchases should be given the legal, financial and environmental knowledge they need to decide to what extent and where environmental factors can best be introduced into the procurement procedure, whether they are set at the right level to get best value for money and whether they match the environmental priorities of the contracting authority.
- It is important to communicate a green purchasing policy to a wide range of stakeholders, including present and future suppliers, service providers or contractors, so that they can take account of the new requirements. Co-operation between purchasing authorities is another way of increasing access to environmental expertise and know-how and of communicating the policy to the outside world.

Setting General Priorities for GPP

Due to the complexity of public procurement (policy frameworks, legal requirements, levels of implementation, products and services) there is a need to set general priorities to further adopt GPP implementation related to the capacities and capabilities of the public authorities. Prioritization ensures that limited resources are not wasted on expenditure sectors where, despite high environmental or socio-economic risk, there is very little scope to influence the market or where the government cannot expect to find environmentally-friendly alternatives at a competitive price.

Therefore, the following aspects should be considered:

- Need for a step-by-step approach to start with a small range of products and services where the environmental impact is clear or where greener alternatives are easily available and not more expensive (e.g. recycled paper, energy-efficient office equipment). Alternatively, start by ensuring that contract specifications do not have a negative impact on the environment (e.g. by excluding the use of recycled components).

Additional Considerations for Setting Priorities

Additional considerations are:

- select those products (i.e. vehicle fleet) or services (i.e. cleaning services) which have a high impact on the environment
- focus on one or more environmental problems, such as climate change or waste or introduce general requirements on energy efficiency or recyclability
- consider availability and cost of environmentally superior alternatives
- consider availability of data
- look for visibility
- consider the potential for technological development
- adopt a scientifically sound life-cycle approach.

Assessment of

Defining needs and objectives could be seen as crucial within the preparatory

Needs and Objectives

phase of any procurement procedure. Here, any mistakes at this stage will adversely affect every successive stage, and ultimately the end result, as all stages build upon each other. Therefore, before starting a tendering procedure, it is needed to set aside enough time for this assessment, which includes also aspects on the instruments to be used to reach the end result.

Needs should be defined in a functional manner, or as solutions to problems rather than concrete products or services, so as not to exclude any potential options available on the market. For instance, considering “need to disseminate information to the public” rather than “purchase printed flyers, posters, and brochures” may ultimately lead to more environmentally friendly solutions being chosen, such as disseminating information electronically.

Another factor underlining the importance of the preparatory stage is that the early stages of the procurement procedure offer relatively the best possibilities for taking into account environmental considerations.

8.2.8 Overview of the GPP Process

The Nature of the Public Procurement Procedure

Public procurement is in essence a question of matching supply and demand, just as with any private procurement procedure, the only difference being that contracting authorities have to exercise special caution when awarding contracts. This is because they are public entities, funded by the taxpayer’s money which have to oblige to some basic principles:

- Getting the best value for money: Contracting authorities have the responsibility to get the best value for taxpayers’ money for everything they procure. Best value for money does not necessarily mean going only for the cheapest offer. It means you have to get the best deal within the parameters you set. The protection of the environment can be one of these parameters and can therefore act as an equal factor amongst the others for the award of the contract. Value for money does not exclude environmental considerations.
- Acting fairly: Acting fairly means following the principles of the market competition, which form the basis for the public procurement legislation. The most important of these principles is the principle of equal treatment, which means that all competitors should have an equal opportunity to compete for the contract. To ensure this level playing field, the principle of transparency must also be applied.

Stages of the Procurement Procedure

In principle, the procurement procedure is part of the „management cycle “which is widely used in business and public organisations (planning, implementation, evaluation and adaptation). The general structure of a public procurement procedure could be identified as follow:

- defining the subject matter of the contract
- drawing up the technical specifications and the contractual parameters for the product/work/service
- selecting the right candidate and determining the best bid.

Defining the Subject Matter of a Tender Contract

Introduction

The “subject matter” of a contract is about what product, service or work the public authority want to procure. This process of determination will generally result in a basic description of the product, service or work, but it can also take the form of a (functional) performance-based definition. For environmental considerations, a performance-based definition appears preferable, since in this case the contracting authority does not need to meticulously stipulate all the characteristics

that the product, service, or work should possess, but only the desired effect it should have.

The steps to be taken to define the subject matter of a tender contract could be described as follow:

The Right to Choose

In principle the public authority is free to define the subject of the contract in any way that meets the defined needs. Public procurement legislation is not so much concerned with what contracting authorities buy, but mainly with how they buy it. For that reason, legislation on procurement defines primarily the “rules of the game”, which means, to safeguard non-discrimination on the market.

Choosing a Green Title for the Contract

This makes it easier for companies to quickly identify what is wanted and conveys the message that the environmental performance of the product or service will be an important part of the contract. Using promotional titles sends out a message not only to potential suppliers, but also to the local community and other contracting authorities.

Conducting a Market Analysis

In the process of determining what to buy, it is essential to have some understanding of the market. It is very difficult to develop a concept for a product, service or work, without knowing what is available at the market. Sometimes, green alternatives are not always obvious or well advertised. Therefore, some research in the form of a market analysis is needed to get an overview of available alternatives and the general price level of the options.

Specify the Environmental Impacts of Options

To define the subject matter of the tender contract it is necessary to get an overview of the environmental impacts of the available options on the market, because the environmental performance of the available options may differ significantly in environmental and economical terms. This includes also aspects of the durability or reparability of products which affects also the life-cycle costing of the options. Here, life-cycle based information build a good foundation for this analysis to specify the objectives, and therefore, to come to a better and balanced decision.

In relation to work contracts in the field of construction, obligations to setup an environmental impact assessment which will effect the definition of the subject matter or the technical specifications need to be taken into account.

With regard to services contracts, the primary environmental focus should be on performance taking into account of the equipment or materials used in the performing of the contract.

Drawing up the Technical Specification

Introduction

After the definition of the subject of the contract, the translation into measurable technical specifications that can be applied directly in a public procurement procedure is required. Technical specifications have two main functions:

- They describe the contract to the market so that companies can decide whether it is of interest to them. They determine the level of competition.
- They provide measurable requirements against which tenders can be evaluated. They constitute minimum compliance criteria. If they are not clear and correct, they will inevitably lead to unsuitable offers. Offers not complying with the technical specifications have to be rejected.

There are various option in place to draw up the technical specification of the tender contract, like

- performance-based specifications

- environmental technical standards or
- use of variants.

As stated above, at this stage of the procurement process the role of eco-labels became relevant.

Performance-based Specifications

Within the European Union for example, the procurement directives explicitly allow contracting authorities to choose between specifications based on technical standards or on performance-based requirements.

A performance-based approach usually allows more scope for market creativity and in some cases will challenge the market into developing innovative technical solutions.

By using this approach, there is no need to express the technical specifications in too much detail. However, when setting performance-based specifications, even more care is needed than when setting conventional technical specifications to make a proper and justifiable evaluation.

Environmental Technical Standards

Technical standards can take a number of forms. Within the context of the European Union, these extend from full European standards (EN's), through European technical approvals and international standards to national standards and national technical specifications.

Standards are useful in public procurement specifications as they are clear, non-discriminatory and developed on a consensus basis.

Some technical standards include clauses that cover the environmental characteristics of products or services. If these specifications are used in public procurement, companies have to provide proof either that they can comply with the standards or, if they do not follow the same methods, that they meet the performance levels set by the standards.

If they cannot provide this proof, they will have to be eliminated. On specific points it is possible to define a higher level of environmental protection (benchmark) than laid down in a standard, provided that this does not discriminate against potential tenderers.

Use of Variants

It is possible that, even after conducting a market analysis, whether any green alternatives to the products, services or works to be purchased exist, or that the purchasers remains unsure about their quality or price. If this is the case, it may be interesting to ask potential bidders to submit green variants, based on a minimal set of technical specifications for the product to be purchased, which will apply to both the neutral offer and its green variant.

When the bids are sent in, it is required to compare them all (the neutral ones and the green ones) on the basis of the same set of award criteria.

Companies are free to provide offers based on the variant or the initial tender, unless indicated otherwise by the contracting authority. This option needs to be specially indicated in advance in the tender documents, that:

- variants will be accepted
- the minimum environmental specifications the variants have to meet and/or
- specific requirements for presenting variants in bids.

Legal Requirements for the Use of Eco-labels

As stated above, one of the obstacles related to the implementation of GPP is based on the fact, that the structure of eco-label criteria in use are somewhere not in full compliance with the legal requirements or with the special needs of GPP. Studies show, that the structure and quality of the information provided by eco-

label criteria needs to be transferred into the application context of GPP (technical specifications, award criteria, contract clauses). Furthermore, eco-labels often comprise information that cannot be used directly as criteria in a public procurement process.

In general, regarding the use of eco-labelling criteria in GPP the following remarks have to be considered („do's and don'ts") under legal aspects:

- One can only refer to the product-related criteria of an eco-labelling scheme (and not related to the environmental performance of a company or an EMS as relevant to the product).
- When seeking to describe a certain product, a public purchaser may decide to refer to all relevant criteria of all existing eco-labels covering this product.
- Another solution is to refer only to one eco-label, but then recognition must be stated that products complying with equivalent criteria, with or without them being covered by an eco-label, will be accepted.
- Preferably one should refer to all product related environmental criteria in an eco-label criteria document and not to part of them, in order to have a well-balanced green product.
- The eco-label should preferably also be used/recognized as proof of the fact that the right product has been delivered: The eco-label itself is evidence of meeting the individual criteria set (thus encouraging companies to get the eco-label). Other equivalent means of proof should be allowed (for instance documentation verified by an independent third party).

Production and Process Methods

What a product is made of, and how it is made can form a significant part of its environmental impact. For example, within the European Union production methods can explicitly be taken into account when defining the technical specification.

Purchasing specific materials: A contracting authority has the right to insist that the product to be purchased should be made from a specified material. It is also possible to indicate the range of materials, or alternatively specify that none of the materials or chemical substances should be detrimental to the environment. A common approach for the green procurement of cleaning products, for example, is for the contracting authority to give an indicative list of hazardous substances harmful to the environment or public health (on the basis of an objective risk assessment) that it does not wish to be present in the product. The right to specify materials or the contents of a product also includes the right to demand a minimum percentage of recycled or reused content where possible.

Process and production methods: If requirements on production methods in the technical specifications will be included, all technical specifications should bear a link to the subject matter of the contract. That means it is only possible to include those requirements which are related to the manufacturing of the product and contribute to its characteristics, without necessarily being visible. The purchaser, for example, can ask for electricity produced from renewable energy sources, although green electricity is not physically different from electricity produced from conventional energy sources, and makes the lights work in exactly the same way. However, the nature and value of the end product has been modified by the process and production method used.

Selecting the Right Candidate

The development of selection criteria is an important part of the procurement procedure. Selection criteria focus on a company's ability to perform the contract they are tendering for. Within the procurement procedure normally different types of criteria are developed:

- exclusion criteria

- criteria on the technical capacity.

Exclusion criteria: The exclusion criteria deal with circumstances in which a company can find itself that normally cause contracting authorities not to do any business with it (e. g. criminal cases, cases of liability, cases of non-compliance with environmental legislation). The cases where a contracting authority can exclude a tenderer are normally listed in full in the public procurement legislation.

Criteria for the technical capacity: Procurement legislation contains an exhaustive list of selection criteria which can be prescribed by the contracting authority with a view to checking the technical capacity of the tenderers to execute the tendered contract. Contracts where environmental technical competence (like qualified staff, knowledge and experience, technical equipment, R&D, technical facilities) could be particularly relevant include waste management contracts, construction, building maintenance or renovation contracts, transport services. Environmental technical competence could include technical competence in minimising waste creation, avoiding spillage of polluting products, reducing fuel costs, minimising disruption of natural habitats.

Criteria concerning the technical capacity could be related to:

- records of contracts already carried out
- educational and professional qualification, and to some extent
- managerial capacities proofed by Environmental Management Schemes (EMS).

Related to the use of EMS within the definition of technical criteria, legislation could allow contracting authorities, in “appropriate cases”, to ask from bidders to demonstrate their technical capacity to meet requirements set by the contract to put into place certain environmental management measures for public works and services contracts. Under “appropriate cases” one should consider contracts, the execution of which could endanger the environment and therefore call for measures to protect the environment during their execution. Naturally, those measures are directly linked to the performance of the contract.

Therefore, it is not permissible to ask to comply with selection criteria that are unrelated to the contract to be performed. This means, that contracting authorities can never require companies to possess a verified EMS.

Awarding the Contract

Introduction

Awarding the contract is the last stage in the procurement procedure. At that stage the contracting authority evaluates the quality of the tenders (the offers) and compares prices. Here, predetermined award criteria, published in advance, should be developed to decide which tender is the best.

Setup of Award Criteria

Within public procurement, there are normally two options to setup award criteria:

- compare offers on the basis of lowest price alone or
- choose to award the contract to the “economically most advantageous” tender, which implies that other award criteria will be taken into account, including the price.

Since the criterion of the “economically most advantageous tender” always consists of two or more sub-criteria, these can include environmental criteria. Examples to allow contracting authorities to determine the most economically advantageous tender include:

- quality
- price

- technical merit
- aesthetic and functional characteristics
- environmental characteristics
- running costs
- cost-effectiveness
- after-sales service and technical assistance
- delivery date and delivery period and
- period of completion.

Techniques for Comparing

As the best offer will be determined on the basis of several different sub-criteria; several techniques for comparing and weighing up the different sub-criteria are used, like:

- matrix comparisons
- relative weightings and
- bonus/malus systems.

It is the responsibility of contracting authorities to specify and publish the criteria for awarding the contract and the relative weighting given to each of those criteria in sufficient time for tenderers to be aware of them when preparing their tenders.

Linking Award Criteria with Technical Specifications

There may be a link between the requirements in the technical specifications and the award criteria. The technical specifications define the required level of performance to be met. A contracting authority can decide that any product, service, or work performing better than the minimum level can be granted extra points, which can be distributed at the award stage. Therefore, it should be possible to translate all technical specifications into award criteria.

Using the Award Criteria

In general, award criteria should meet four conditions:

1. Award criteria must have a link to the subject matter of the contract.
2. Award criteria must be specific and objectively quantifiable.
3. Award criteria must have been advertised previously.
4. Award criteria must respect the law.

Using Life Cycle Costing

At the award stage of a procurement procedure the price of a tender is always one of the most influential factors. The purchase price is just one of the cost elements in the whole process of procuring, owning and disposing. To assess the whole cost of a contract, purchasers need to look at all the different stages in which costs occurred during the lifetime of the product or service. This is known as “life cycle costing” approach.

Normally, life cycle costing should cover:

- purchase and all associated costs (delivery, installation, commissioning, etc).
- operating costs, including energy, spares, and maintenance.
- end of life costs, such as decommissioning and removal.

These costs should be factored in the award stage to ensure that they are taken into account when determining the most economically advantageous tender. This will help to get a product with a better environmental performance, as the process will reveal costs of resource use and disposal that may not otherwise have received proper attention.

Contract

The contract performance clause specify the way on how the contract will be

performance

performed or delivered, e. g. like

- quantity of delivery
- transport and time of delivery of products
- disposal/take back of used products or packaging
- training of contractor staff.

It has to be stated, that contract clauses should not play a role in determining which tenderer gets the contract, which means that any bidder should, in principle, be able to cope with them.

Even though contract clauses are considered to be outside the procedure of the award of contracts they still need to be set out clearly in the call for tenders.

A contractor is obliged to respect all the performance clauses set out in the contract documents, when carrying out the work requested or supplying the products covered by the call for tender.

Reference

Please see the above mentioned websites to find guidelines and tools to better integrate environmental aspects in the procurement process.

8.2.9 Conclusion and Discussion

Success Factors

To overcome the various obstacles and barriers related to the further mainstreaming of GPP implementation to promote SCP the following success factors and framework conditions needs special attention:

- create political leadership
- engage all interest parties in the policy design of GPP
- setup clear policies and agree on sustainability priorities
- establishing (mandatory and voluntary) GPP requirements
- develop public expenditures management frameworks
- organize joint procurement by public administration authorities
- improve awareness raising on all levels of public procurement
- provide practical guidelines, tools and trainings for procurements officers
- launch pilot projects and studies to demonstrate the feasibility and positive impacts of GPP.

Summary on Guidance

Translating policies into better and effective integration of environmental aspects into public procurement practices and procedures, the following guidance should be taken into account:

Legal Obligations

Public purchasers have a stricter legal obligation than private purchasers to get the best value for money and to be fair in procurement procedures. Best value for money can include environmental considerations. Being fair means providing equal opportunities and guaranteeing transparency.

Preparatory Stage is Crucial

The preparatory stage within public procurement is crucial. Thorough analysis and planning is essential before launching a tender if environmental goals are to be achieved. It is particularly important to analyse exactly the needs and objectives, before deciding on a solution.

Subject Matter

When defining the subject matter of a contract while including environmental considerations, this should be done without distorting the market, i.e. by limiting or

hindering access to it.

Market Analysis Market analysis can provide essential information about the environmental options available and about general commercial rates and conditions.

Use Eco-labels The underlying technical specifications of eco-labels may prove very useful for the drafting of technical specifications; however it is not allowed to require tenderers to have registered under any eco-label scheme.

Company's Environmental Performance In the technical capacity criteria, the past experience of a company and the professional qualifications of its personnel offer good opportunities for including green considerations.

In order to check whether of tenderers can perform the environmental management measures prescribed by the contract contracting authorities may ask them to demonstrate their technical capacity to do so. Environmental management systems, such as EMAS, can serve as a (non-exclusive) means of proof for that technical capacity. Setting requirements to comply with any particular environmental management system is not allowed.

Life Cycle Costing Adopting a "life cycle costing" approach reveals the true costs of a contract. The use of this approach in preparation of the award criteria will improve (often) both the environmental performance and the financial position.

Contract Clauses Contract clauses can be used to include environmental considerations at the performance stage, provided they are published in the contract notice or the specifications

Key References UNEP/Marrakech Task Force on SPP:
http://www.unep.fr/scp/procurement/docsres/

EU: http://ec.europa.eu/environment/gpp/index_en.htm

OECD:
http://www.oecd.org/document/21/0,3343,en_2649_34281_37414933_1_1_1_1,00.html

ICLEI: http://www.iclei.org/

8.3 Promoting Sustainable Products Through Economic Instruments

8.3.1 Introduction

About Economic Instruments Economic instruments have gained particular attention in recent years as an important tool for reinforcing and implementing environmental policy while simultaneously contributing to sustainable development. The advantages of economic instruments, when used under specific conditions, encompass the provision of incentives for behavioural change, the generation of revenue for financing further environmental investments, the promotion of technological innovation, and the reduction of pollution at the lowest costs to society.

Learning objective

The learning objective of this section is to provide a basic understanding of the use of economic instruments to promote sustainable consumption and production and of the linkage between eco-labelling and economic instruments.

Content of this Section

This section provides:

- a basic introduction of the use of economic instruments within environmental policy (functions, objectives and applications of economic instruments)
- some indications of the effectiveness of economic instruments
- an overview of the debate on the introduction of a reduction of VAT rates for eco-labelled products in the European Union.

8.3.2 Background on Economic Instruments

Promoters and Drivers

International bodies, like OECD, UNECE, UNEP, have become strong promoters of the use of economic instruments for a better environment. Also the European Commission put emphasis on the use of economic instruments within environmental policy as part of their overall commitment to sustainable development and stressed the need to further develop and streamline the various economic instruments and legislative frameworks, like energy taxation, within the European Union, shifting the tax burden from welfare-negative taxes (e.g. on labour) to welfare-positive taxes, (e.g. on environmentally damaging activities), and to create a win-win option to address both environmental and employment issues.

Limitations

Due to the complexity of the theoretical, conceptual and political backgrounds of economic instruments, it is not possible to provide specific knowledge and insights on the use of economic instruments in environmental policy to stimulate sustainable consumption and production patterns. Studies on the assessment of economic instruments show the vast variety of applications within environmental policy, but also the problem to adequately evaluate the effectiveness of economic instruments related to the desirable environmental, economical and social outcomes and impacts.

Definition

Within science, economic instruments are part of a wider research area of environmental economics, a subfield of economics concerned with environmental issues. Beside many other definitions:

„ (...) Environmental Economics (...) undertakes theoretical or empirical studies of the economic effects of national or local environmental policies around the world (...). Particular issues include the costs and benefits of alternative environmental policies to deal with air pollution, water quality, toxic substances, solid waste, and global warming. (US National Bureau of Economic Research Environmental Economics program)

Concept of Market Failure

Central to environmental economics is the concept of market failure. Market failure means that markets fail to allocate resources efficiently. As commonly stated, a market failure occurs when the market does not allocate scarce resources to generate the greatest social welfare. A wedge exists between what a private person does given market prices and what society might want him or her to do to protect the environment. Such a wedge implies wastefulness or economic inefficiency. Resources can be reallocated to make at least one person better off

without making anyone else worse off. (Hanley, Shogren, and White 2007: Environmental Economics).

Common forms of market failure include:

- externalities
- non excludability (common property) and
- non rivalry or public goods.

Externality

The basic idea is that an externality exists when a person makes a choice that affects other people that are not accounted for in the market price. For instance, a firm emitting pollution will typically not take into account the costs that its pollution imposes on others. As a result, pollution in excess of the 'socially efficient' level may occur.

In general terms, an externality could be defined as a situation in which a private economy lacks sufficient incentives to create a potential market in some good, and the nonexistence of this market results in the loss of efficiency. In economic terminology, externalities are examples of market failures, in which the unfettered market does not lead to an efficient outcome.

Common Property and Non-Exclusion

When it is too costly to exclude people from accessing a rivalries environmental resource, market allocation is likely to be inefficient. The challenges related with common property and non-exclusion have long been recognized, like Hardin's (1968) concept of the tragedy of the commons.

Within this concept, "open-access" implies no ownership in the sense that property everyone owns nobody owns. The basic problem is that if people ignore the scarcity value of the commons, they can end up expending too much effort, over harvesting a resource (e.g., a fishery).

In the absence of restrictions, users of an open-access resource will use it more than if they had to pay for it and had exclusive rights, leading to environmental degradation.

Public Goods and Non-Rivalry

Public goods are another type of market failure, in which the market price does not capture the social benefits of its provision. For example, protection from the risks of climate change is a public good since its provision is both non-rival and non-excludable.

Non-rival means climate protection provided to one country does not reduce the level of protection to another country. Non-excludable means it is too costly to exclude any one from receiving climate protection.

A country's incentive to invest in carbon abatement is reduced because it can "free ride" off the efforts of other countries. In literature it is widely discussed how public goods can be under-provided by the market because people might conceal their preferences for the good, but still enjoy the benefits without paying for them.

8.3.3 The Role of Economic Instruments in Environmental Policy

Objectives of Environmental Policy

While environmental problems vary in their details, they generally involve either overuse of a natural resource or emission of damaging pollutants or others. The objective of environmental policy is to

- modify, slow, or stop resource extraction
- reduce or eliminate emissions of concern and
- shift consumption and production patterns towards greater sustainability.

These objectives are the same whether the policy instrument chosen, like it legislative measures (command and control), economic instruments, or information and communication. Normally, the more severe the damage and the stronger the link between specific activities and environmental harm, the more rapid and extensive the policy response should be.

Economic Instruments as Part of a Policy Mix

New policy solutions occur in the context of existing institutional, legal, and economic conditions. Environmental laws, for example, have been developed over many years and with great political effort. They can provide an important framework and justification for other actions, even if they are not as efficient as one might like. The greater potential efficiency of economic instruments must often be balanced against these existing policy constraints, and consider the relative maturity and strength of existing legal and political institutions and political factions.

Within the theoretical and political discussion it is commonly recognised, those economic instruments need not be the sole policy response but can be beneficial even as one component of a wider policy package.

For example, regulations are often used to set the broad parameters (e.g., total emissions, licensing requirements, etc.) under which economic instruments can be used to obtain a more efficient allocation of responsibility and compliance across firms. Because economic instruments can complement rather than replace many legislative policies, there are many potential applications for them even in countries with existing policy constraints.

Fields of Application of Economic Instruments

Economic instruments have been proposed and implemented within environmental policy around the world to address a host of environmental concerns, like:

- use of natural resources (energy, water, soil and minerals)
- solid waste and waste water management
- protecting biodiversity
- sustainable land use (agriculture, fishery, settlement)
- reduction of air pollution (from production, transport).

Furthermore, economic instruments have become important also in related policy fields, like health policy, food policy and so on to meet the desirable political objectives.

Objectives and Benefits of Economic Instruments

The use of economic instruments in environmental policy has a number of advantages that has made them indispensable tools. In principle, to overcome the various market failures, described above, economic instruments work by internalizing environmental costs and other social externalities through increasing the prices that individuals and industries must pay to use resources or to emit pollutants. By incorporating environmental or social costs into the prices of goods, services or activities that give rise to them, the basic function of economic instruments is to send a price signal to users or consumer to reduce inefficient and wasteful use of resources or to foster their optimal allocation.

As resources or emissions become more expensive, consumers have strong monetary incentives to reduce resource use, either through:

- conservation
- substituting materials with a more favourable environmental profile or
- rationalizing consumption.

Because they are generally less expensive, more flexible, and more dynamic than legislative approaches, the increased usage of economic instruments can offer wide-ranging benefits, like:

- Economic instruments are important tools for the implementation of the

"polluter and user pays" principle (PPP).

- Economic instruments may be capable of addressing diffuse pollution, an area where traditional command-and-control instruments often fail.
- Economic instruments can help to reduce the impacts of environmental controls on industry costs and competitive position relative to alternative policies.
- Economic instruments can generate technological innovation and help to spur the creation of new domestic industry for eco-innovation.
- Economic instruments may increase the transparency of policy-making and impacts.
- Economic instruments could be a good source towards cost-recovery of public provision of services and public revenues.

Key Functions of Economic Instruments

Economic instruments to be used in environmental policy can be classified according to the principal objectives they aim to fulfil:

Incentive function:

In cases where the primary purpose of an economic instrument is to create the necessary incentives for behavioural changes, the mechanism can be categorized as an incentive-based instrument.

- Example: Incentive taxes are levied with the intention of changing environmentally damaging behaviour and without the primary intention to raise revenues. In contrast to regulations, charges, e.g. on emissions, can provide a continuous incentive for improvements in abatement technology. The incentive function can, however, only develop its potential if rates are set sufficiently high for stimulating the source to invest in emission abatement. The success of such a tax can therefore be determined by the extent to which initial revenues from it fall as behaviour changes.

Fiscal or financial function:

When the primary aim of an environmental charge or tax is not to create incentives but to raise revenue, the relevant distinction lies in whether the revenue is earmarked or simply added to the general government budget.

- Example: If the purpose of a tax is merely to gain money for the national budget, the economic instrument can be categorized as a fiscal environmental tax. A charge (or tax) fulfils a financing function if the revenue is allocated for specific environmental purposes (earmarked), e.g. if the money raised from water supply charges is spent on public water management costs. While it is argued that the economic rationale for such schemes is weak, they may nevertheless play an important role in enhancing the acceptability of the taxes and charges in question in the public opinion, and in providing funds for environmental expenditures.

Soft functions:

Aside from the functions outlined above, economic instruments can have additional results such as, for example, capacity building and improvements in implementation ("soft functions").

- Example: An abstraction tax (e. g. water) can help to create revenues to build up personnel capacities and administrative structures for better water resource management. It also can provide the needed financial baseline for information, monitoring and documentation, but also for control mechanism and enforcement.

Studies and Database on Use of Economic

Many existing studies group economic instruments in instrumental types: permits, taxes, charges, deposit-refund systems, and the like. Based on a database, the OECD and the EEA surveyed over 375 different taxes applied by OECD countries (not counting other measures such as some 250 environmentally related fees and

Instruments

charges). The database includes the energy and transport sectors, and a number of taxes and charges linked to measured or estimated emissions.

Other, like UNEP, categories economic instruments instead by their functional objective (see above), i.e., what they accomplish in the marketplace. The aim of this approach is to provide a more intuitive system by which policy makers can quickly narrow down their range of instruments once they have defined their problem.

Overview of Types of Economic Instruments

Economic instruments comprise a variety of policy approaches that encourage behaviour through their impact on market signals rather than through explicit directives regarding pollution control levels or methods, or resource use. In practice, this encompasses many policy instruments including

- permits
- quotas
- licenses
- concessions
- user fees
- use taxes
- access fees
- impact fees
- performance bonds
- deposits
- rights to sue
- and financial assurance.

Variants on Economic Instruments

Each of the mentioned economic instruments has common variants. For example:

- any rights to access a resource or emit a pollutant can be marketable or non-marketable
- they may be allocated by auction, or
- by past production level.

The range of possibilities is large and potentially confusing.

Examples

At the EU level, the most commonly used market-based instruments are taxes, charges and tradable permit systems. In economic terms these instruments work in similar ways. However, they also differ in notable aspects.

- Firstly, quantitative systems, such as tradable permit schemes, provide more certainty as regards reaching specific policy objectives, e.g. emission limits, (subject to effective monitoring and compliance) compared to purely price-based instruments, such as taxes.
- Secondly, they differ when it comes to the aspect of revenue generation. Taxes (and in a more limited way charges) have increasingly been used to influence behaviour, but they also generate revenue.
- The above features have, to an important extent, influenced the ways and areas that the EU currently uses market-based instruments at Community level, thus leading to the introduction of instruments such as the EU Emission Trading Scheme (“the EU ETS”), the Energy Taxation Directive, and, in the field of transport, the Eurovignette directive.

Reference: European Commission Green Paper on market-based instruments for environment and related policy purposes 2007

8.3.4 The Effectiveness of Economic Instruments to Promote SCP

Introduction

In literature, there is no clear picture on the overall effectiveness of economic instruments used in environmental policy. Also related to the question of changing sustainable consumption and production patterns, assessments and empirical studies, e. g. the OECD study on household consumption (related to various fields of consumption, like energy, waste, food, transport), are not clear in their results on the impacts of economic instruments to change behavioural patterns.

OECD Study on the Effectiveness of Taxes

Related to the evaluation of the used taxes in all OECD countries, OECD concludes that the environmentally related taxes raise revenues in the order of 2-2.5% of gross domestic product (GDP). The amount of revenue raised is, however, not a precise indicator of the environmental impacts of the tax and charges. The OECD stressed, that many existing environmentally related taxes applied in the countries are contributing to environmental improvements.

Tax increases are reflected in price increases, and higher prices clearly reduce demand for environmentally damaging products, e. g. fuel use has significantly fallen in recent years for example in response to higher crude prices and fuel taxes.

Example: In a number of countries, using the sulphur content of the fuel as one determinant of the level of fuel tax has led to a strong decrease in sulphur dioxide (SO_2) emissions.

Example: A tax on plastic bags in Ireland rapidly had the desired environmental effect of sharply reducing plastic bag usage – for one thing, shops stopped giving them away free to customers, and the increased price of the bags encouraged customers to return to re-usable shopping bags. Additionally, the example indicates also that the administrative costs of schemes involving a large number of tax payers can be kept at relatively modest levels. In the case of the Irish tax on plastic bags, for example, thousands of retailers serve as tax collectors, but the related administrative costs have been modest, since the bag tax was integrated with the existing Value Added Tax collection system.

Negative Impacts

Environmentally related taxes may be efficient, but when implementing them governments have to take into account concerns about any negative impact they might have on the competitiveness of certain sectors, such as energy-intensive or export-oriented industries, and on individuals or households.

Most studies show that environmentally related taxes, especially energy taxes, can have a direct regressive impact on the income distribution of households. A less wealthy household spends a larger proportion of its income on heating, for example, than its better-off neighbours; so a tax that increased the price of household energy would hit the poorer family harder.

Fairness

There are several ways in which governments can mitigate or remove this effect, but some of these will reduce the environmental effectiveness of the measure more than others. To meet these concerns, OECD governments often grant exemptions to these taxes.

However, many economic instruments involve a large number of special provisions that increase their administrative costs. Such mechanisms are often introduced for non-environmental reasons, such as addressing competitiveness or income distribution concerns. So, there can be a trade-off between the size of the administrative costs and the measures used to create a “fair” or “politically acceptable” scheme.

8.3.5 Linkages and Synergy between Economic Instruments and Eco-labelling

Introduction

Related to OECD, product labelling are sometimes included also as economic instruments as well. Here, voluntary industry standards or labelling programmes are sometimes classified as economic instruments, because they modify demand through the provision of increased data on products to consumers in the marketplace. If voluntary programmes achieve a critical mass of participation and establish credible validation that stated commitments are being met, they can generate an effective impetus for environmental improvement. (OECD: Environmentally Related Taxes in OECD Countries, 2001, p. 41)

Beside this, there are some indications that combining economic instruments with eco-labelling may increase the effectiveness of the policy mix to promote sustainable consumption and production in different ways, like

- Signalling function or
- Incentive function.

Signalling Function

Within a policy mix, for example, a tax can be reasonably effective in reducing the total amount used of a given type of product, and the choice between different product varieties. Here, a labelling system can help increase the effectiveness of a tax by providing better information to the users on relevant characteristics of different products the tax applies to, e.g. the energy efficiency of appliances. This will increase the price-sensitivity of demand for the product.

Incentive Function

On the other hand, economic instruments, like taxes and market incentive programmes, are mostly (and controversial) discussed to provide clear economic incentives to companies and consumers to support the market diffusion of eco-labelled products, like the ongoing debate on a VAT reduction on EU eco-labelled products within the European Union.

VAT Reduction on Eco-labelled Products within the EU

Within the IPP approach of the European Union, outlined under 2.4, there is an ongoing discussion on the possibility to introduce a VAT reduction on EU eco-labelled products within the European Union since 2001.

Within the debate, it is often stated by environmental and consumers organizations, that a reduced VAT rate for consumer products, goods and services that are environmentally-friendly, energy efficient and take into account of natural resource use, will have clear environmental and economic benefits. This position is also supported by some Member States, like the UK or France.

Also the European Commission sees – in principle - a need to further elaborate the possibilities to give consumers stronger incentives to buy green products, but sees VAT reduction not as adequate possibility so far. The Commission stated:

- If reduced rates were extended to new sectors, this would lead to a lack of harmonisation in VAT rates, whereas it is vital to safeguard the Community acquis by maintaining the degree of harmonisation already achieved through the application of the standard rate currently in force in all or most of the Member States. Article 93 of the EC Treaty refers to the adoption of provisions for the harmonisation of legislation concerning turnover taxes to the extent that such harmonisation is necessary to ensure the establishment and the functioning of the internal market.
- Furthermore, the Commission is convinced that the reduction of VAT rates is not the best way of encouraging consumers to buy or use certain goods or services. VAT, unlike excise duty for example, is not aimed at, and does not lead to, change in consumer behaviour. A reduction in VAT rates is never passed on in full in consumer prices. Very often it is negligible and temporary. Any economic mechanism based on the premise that a reduction of VAT will lead to a reduction in prices and, consequently, an increase in demand cannot work.

- VAT is a consumption tax and its main objective is to generate tax revenue: each Member State uses this revenue according to its own priorities. It can never be used to subsidise particular sectors.

Out of this discussion it becomes clear, that the introduction of a VAT reduction is primarily a political decision to change framework conditions to promote sustainable consumption and production within society.

Eco-label and Market Incentive Programmes

To boost the development of eco-innovation and the market diffusion of environmental-friendly technologies and products, countries introduced market incentive programmes as instrument to help industry, private investors, and consumers to cut costs while choosing green alternatives.

These state aid programmes have become important in the field of climate change policy, like the energetically modernization of old buildings, or the application of solar/photovoltaic panels.

Within these market incentive programmes, eco-labels could be introduced as reference to a specific technical standard which must be comply with while receiving the financial grant. In Germany, for example, the Blue Angel criteria for the various types of energy efficient heating systems where introduced, because the criteria sets a benchmark which lies 30% over the threshold required by legislation. Here, the eco-label was used as benchmark and possibility to show compliance with the standards (note: the use of the eco-label itself was not mandatory in the programme).

8.3.6 Conclusion

Conclusion

Out of this section, the following conclusions can be drawn:

- economic instruments are widely used in environmental policy to overcome several market failures related to environmental protection and to stimulate sustainable development
- economic instruments encompass the provision of incentives for behavioural change, the generation of revenue for financing further environmental investments, the promotion of technological innovation, and the reduction of pollution at the lowest costs to society
- the applied approaches are manifold related to the specific policy objectives and framework conditions
- the introduction of economic instruments are part of a wider policy package
- economic instruments have proven to work for a better environment, but have so far not shift unsustainable consumption patterns significantly
- the negative impacts and distributional effects of economic instruments needs special attention while setting up a „fair“ policy approach
- the setup of special economic measures to promote eco-labelled products could be seen as valuable step forward, but this needs further elaborations and a clear political commitment.

Further Reading

UNEP (2004): The use of economic instruments in environmental policy: challenges and opportunities.

OECD (2006): Environmental Tax Brief.

EU (2007): Green Paper on market-based instruments for environment and related policy purposes.

Useful Links

OECD Database on Taxes: http://www2.oecd.org/ecoinst/queries/index.htm

OECD:
http://www.oecd.org/department/0,3355,en_2649_34295_1_1_1_1_1,00.html

UNEP: http://www.unep.org/publications/search/pub_details_s.asp?ID=11

UNECE: http://unece.org/env/europe/economic_instruments.htm

8.4 Promoting SCP through Education

8.4.1 Introduction

Concept of Sustainable Development

The concept of sustainable development emerged in the 1980s in response to a growing realisation of the need to balance economic and social progress with concern for the environment. The concept of sustainable development gained worldwide support with the publication of Our Common Future by the World Commission on Environment and Development in 1987 and was a key issue on the agenda at the 1992 United Nations Conference on Environment and Development (UNCED) held in Rio de Janeiro, while Chapter 36 of Agenda 21 identified education as foundation of sustainable development.

Education and Capacity Building as Means of Implementation

Since that date, sustainable development evolved as a concept for education and capacity building, and was stressed as important means of implementation to reach sustainable development. The Johannesburg Summit 2002 reaffirms the centrality of education to foster sustainable development. The Plan of Implementation recognises education as critical for sustainable development in its own right, but also sees education as a key agent for change and a tool for addressing such important question amongst others as changing consumption patterns.

The WSSD resulted in a broadened understanding of the concept of sustainable development and an increased awareness of the complexity of promoting sustainable development, putting the people's capacities and capabilities into the centre of action, and to empower and enable citizens to act for the needed environmental and social change.

Education for Sustainable Development

To promote the further implementation of „Education for Sustainable Development“ (ESD) and to build synergies on the various programmes on the different levels the WSSD also called for the setup of an UN Decade on Education for Sustainable Development (DESD) by 2005 under the leadership of UNESCO. Within this framework, ESD is now promoted in a broad number of developing and developed countries based on national action programmes to be further integrated into the formal and non-formal education sector. The midterm review of the DESD in 2009 showed the variety of applied concepts and approaches, institutional settings, issues and practical implementation of ESD, but also the need to further strengthen the political commitment towards a further and more systematic institutionalisation of ESD.

SCP as Overarching Issue for Education for Sustainability

Based on the understanding, that ESD at all levels can shape the world of tomorrow, equipping individuals and societies with the skills, perspectives, knowledge and values to live and work in a sustainable manner, the issue of sustainable consumption and production, including the question on changing lifestyles, emerged to an overarching issue of ESD. Here, ESD aims to support a responsible citizenship and fights against the social and resource impacts of unsustainable lifestyle and consumption habits by encouraging new behaviours to

protect the world's natural resources.

To support the better integration of SCP related issues into the ESD concept and to further promote education on the various levels as practical means for changing unsustainable consumption patterns and lifestyles, two specific Task Forces were setup in the framework of the Marrakech process.

Empowerment

In recent years, it became evident, that education alone does not change unsustainable consumption practices or lifestyle habits in practical terms. To become practical relevant, educational processes have to be much more embedded into broader approaches on empowerment and communication, which contain an integrated mix of information, learning and practical involvement, but also the stimulation of institutional innovation within the educational sector to promote sustainable consumption practices through strategic cooperation.

Eco-labelling and Education

Here, eco-labelling became an issue of practical value for ESD in various forms, which will be demonstrated in the learning unit in more detail. Furthermore, some practical approaches will be demonstrated on how eco-labelling itself could be better supported by the educational system.

Learning Objective

The learning objective of this section is to provide an overview on the central role of education and capacity building to promote sustainable development and SCP.

Content of this Section

This section:

- outlines the policy frameworks on education on sustainable development (ESD) on the international level with a specific focus on the UN Decade for Education on Sustainable Development
- provides a basic understanding of the aim and concept of ESD
- outlines the political needs to better integrate the concept of education for sustainable consumption (ESC) as special dimension into ESD
- specify the objectives and approaches to better implement ESC
- gives practical examples on how eco-labelling could be better promoted through education
- provides practical steps for the experts to identify possibilities for strategic cooperation between eco-labelling and education.

8.4.2 Education as Means of Implementation for Sustainable Development

Challenges for Education and Sustainability

Education as Tool to Achieve Sustainability

Education is an essential tool for achieving sustainability. People and governments around the world recognize that current economic and social development trends are not sustainable and that public awareness, education, and training are key to moving society toward sustainability.

The concept of sustainable development emerged in the 1980s in response to a growing realisation of the need to balance economic and social progress with concern for the environment and the stewardship of natural resources. The global community acknowledged that a closer examination was needed of the inter-relationships between the environment and socio-economic issues of poverty and underdevelopment.

Complexity of Issues

The concept of sustainable development recognises the complexity and interrelationship of critical issues such as

- poverty
- unsustainable consumption
- environmental degradation
- urban decay
- population growth
- gender inequality,
- health
- conflict, and
- the violation of human rights.

Linkage between Education and Sustainability

Based on the definition, that sustainable development is essential to satisfy human needs and improve quality of life within the carrying capacity of the natural environment, it has become clear that education and sustainability are inextricably linked:

- sustainable development as wider strategy towards capacity building within societies
- sustainable development as means to meet basic educational needs and to increase the level of education
- education as means of implementation to achieve sustainable development.

Behind this background, it has become clear, that achieving sustainable development requires a deep rooted reform of the educational system and a new concept understanding of education, known as education for sustainable development (ESD).

Political Response to the Need for Reorienting Education

The origins of ESD lie in the development of environmental education (which highlighted the interrelatedness among people, cultures and the ecosphere) and consumer education (which focused on the identified four major thrusts of ESD. The need to reorient education was highlighted.

United Nations Conference on the Human Environment in Stockholm in 1972

The United Nations Conference on the Human Environment in Stockholm in 1972 laid the groundwork and led to the International Environmental Education Programme (IEEP). A significant outcome of the IEEP was the Belgrade Charter which called for educational policies which would assist individuals to adjust their own priorities and assume a personal and individualized global ethic which would reflect in their daily behaviour.

UN Guidelines for Consumer Protection 1985

The adoption of the UN Guidelines for Consumer Protection in 1985 by the United Nations also confirmed the importance of consumer education.

UNCED 1992

The AGENDA 21 (Chapter 36) of the UNCED in 1992 focused to an even greater degree on ESD which stressed the further need for:

- promotion and improvement of basic education:

Background: Access to basic education remains a problem for many - especially girl children and illiterate adults. Simply increasing basic literacy and numeracy, as currently taught, will not significantly advance sustainable societies. Instead, basic education must focus on imparting knowledge, skills, values, and perspectives that encourage and support citizens to lead sustainable lives.

- reorienting existing education at all levels to address sustainable development:

Background: Rethinking and revising education from nursery school through university to include more principles, skills, perspectives, and values related to sustainability in each of the three realms - social, environmental, and economic - is important to our current and future societies.

- developing public understanding and awareness of sustainability:

Background: Making progress toward more sustainable societies requires a population that is aware of the goals of sustainable societies and has the knowledge and skills to contribute toward those objectives. Informed voting citizenry and knowledgeable consumers can help communities and governments enact sustainability measures and move toward more sustainable societies.

- training:

Background: All sectors of the workforce can contribute to local, regional, and national, sustainability. The development of specialized training programmes to ensure that all sectors of the workforce have the knowledge and skills necessary to perform their work in a sustainable manner has been identified as a critical component of ESD.

Millennium Development Goals

Holistic, integrated educational approaches were encouraged then and as apart of the Millennium Development Goals adopted by the U.N. General Assembly in 2000.

World Summit 2002

The World Summit on Sustainable Development in Johannesburg reaffirms the centrality of education to the creation of a sustainable future and recognises education as critical for sustainable development in its own right, but also sees education as a key agent for change and a tool for addressing such questions as: gender equality, rural development, health care, HIV/AIDS, and changing consumption patterns. The Johannesburg Plan of Implementation calls also for more synergy among global initiatives in education and recommends that the UN General Assembly consider adopting a Decade of Education for Sustainable Development (DESD) starting in 2005.

The UN Decade for Education for Sustainable Development 2005-2014 (DESD)

Aim of the DESD

Based on a decision of the UN General Assembly in December 2002 the UN Decade for Education for Sustainable Development (DESD) was initiated in 2005, coordinated by UNESCO. The aims of the DESD are:

- to integrate sustainable development into education systems at all levels in order for education to be a key agent for change
- to promote education as the basis for a sustainable human society and
- to strengthen international cooperation toward the development of innovative policies, programmes and practices of education for sustainable development (ESD).

DESD International Implementation Scheme

Within the period 2005-2014, the DESD consists on an international implementation scheme which focuses on activities to engage in wide consultations with multiple partners in developed and developing countries, emphasising the global nature of ESD and the need to scale-up successful approaches, and link activities under the Decade with various other international educational processes.

The ultimate objective and output of the international implementation scheme is to:

- raise public awarenes on ESD
- provide recommendations for Governments on how to promote and improve the integration of ESD into their respective educational policies, strategies and plans at the appropriate levels
- adopt a holistic and trans-disciplinary approach to ESD and
- establish international, regional and national networks with a broad range of partners to support ESD programmes and implementation.

Regional

The DESD calls for to setup regional implementation processes and calls

Implementation Processes and National Action Plans on ESD

governments to launch national action plans and programmes on ESD. Therefore, UNESCO produced a "Guidance for the Preparation of National Launches and Activities of the United Nations Decade of Education for Sustainable Development" (www.unesco.org/education/desd) to assist governments in the early stages of planning national or local implementation strategies.

Based on the midterm review of the DESD in 2009, it was summarised that consultation and implementation processes in every region were launched and in a quite number of countries national action plans and programmes on ESD were established. But, the midterm conference in March 2009, held in Bonn, Germany, also stressed the need for further improvements of the implementation of ESD („Bonn Declaration on ESD").

8.4.3 The Concept of ESD and the Special Dimension of Sustainable Consumption and Production

The Concept of ESD

Overall Goal of ESD

Complex as the Decade and the concept of ESD is, its conceptual basis, socio-economic implications, and environmental and cultural connections make it an undertaking which potentially touches on every aspect of life. The overall goal of ESD is to integrate the values inherent in sustainable development into all aspects of learning to encourage changes in behaviour that allow for a more sustainable and just society for all.

Basic Understanding of ESD

Related to UNESCO, the basic understanding of ESD is:

- Education at all levels can shape the world of tomorrow, equipping individuals and societies with the skills, perspectives, knowledge and values to live and work in a sustainable manner
- ESD is a dynamic concept encompasses a new vision of education that seeks to balance human and economic well-being with cultural traditions and respect for the earth's natural resources
- ESD applies trans-disciplinary educational methods and approaches to develop an ethic for lifelong learning fosters respect for human needs that are compatible with sustainable use of natural resources and the needs of the planet and
- nurtures a sense of global solidarity.

Objectives of ESD

Therefore, ESD is a means to:

- empower citizens to act for positive environmental and social change
- imply a participatory and action-oriented approach
- integrate concepts and analytical tools from a variety of disciplines to help people better understand the world in which they live
- require educators and learners to reflect critically on their own communities, identify non-viable elements in their lives, and explore tensions among conflicting values and goals.
- bring a new motivation to learning as pupils become empowered to develop and evaluate alternative visions of a sustainable future and to work to collectively fulfil these visions.

Sustainable consumption and lifestyles as special dimension to ESD

SCP as Key Area for ESD

The DESD recognised the issue of sustainable consumption and lifestyles as a key area for action within ESD:

- Our choices as consumers today will impact the way people live tomorrow. Sustainable consumption means consuming goods and services without

harming the environment or society.

- Living a sustainable lifestyle is essential to overcoming poverty and conserving and protecting the natural resource base for all forms of life.
- ESD promotes responsible citizenship and fights against the social and resource impacts of unsustainable lifestyle consumption habits.
- ESD must encourage new behaviours to protect the world's natural resources.

Requirements

It was also recognized that achieving more sustainable consumption patterns requires:

- both business practices and government polices that broaden the range of choices and guarantee clear and reliable information open to consumers to make environmentally and ethically sound decisions. Education plays a particularly important role in catalyzing this process.
- Education is intended to enable students to take informed and responsible decisions and actions, now and in the future.

Main Challenge

The main challenge in relation to ESD is how to support initiatives which stimulate the individual's awareness of the central role they play in forming society and empower them to choose responsible, sustainable consumption and lifestyles and providing opportunities for learning about the systems and processes connected to consumption and production, but also such central questions as the value of material and nonmaterial prosperity, consumer rights and so on.

Lack of Integration

But, despite increased awareness of the human impact on the environment and a greater focus on personal as well as global consequences of individual lifestyle choices, sustainable development and sustainable consumption are still not central topics in educational systems today.

Several Shortcomings

Today, education is being redesigned in terms of how to prepare people for life: for job security; for the demands of a rapidly changing society; and for technological changes. Numerous aspects of sustainable consumption are already taught by ESD but there is a general lack of cohesiveness and innovation.

Several shortcomings need to be overcome:

- On the conceptual level, the understanding of the vision of sustainable consumption based on sustainable human development is often vague or lacking. On the level of course content, some of what is presented is fragmented and occasionally based on outdated scientific data and models which have proven to function poorly in real life.
- On the didactical level, teachers struggle to combine theory, research and practice, finding it difficult to connect the course content to the everyday lives of the students.
- And on the level of student motivation, teachers encounter disillusionment, passivity, fatalism and a sense of powerlessness.

The Marrakech Task Force on Education for Sustainable Consumption (MTF ESC)

Introduction

To meet both the challenges of education and sustainable consumption and to promote the right framework conditions to integrate the better implementation of the issue of sustainable consumption and lifestyles in ESD, the Task Force on Education for Sustainable Consumption under the Marrakech Process on SCP was established.

Aim of the Task Force

The Marrakech Task Force on Education for Sustainable Consumption, led by the Italian Ministry for the Environment, Land and Sea, was launched in 2006 during the

14th Session of the United Nations Commission on Sustainable Development (CSD14 - New York, May 2006). The Task Force focuses on introducing sustainable consumption and production issues into formal curricula through the identification of formal education tools and strategies, the identification of competences and skills at all levels (education, training process, decision making), and by encouraging measures to ensure the effectiveness of national/regional policies. The Task Force's approach to Education for Sustainable Consumption (ESC) is also developed with regards to life-long learning processes, and fully considers the role of corporate, social and environmental responsibility.

Work Programme

As stated in the terms of references, the Task Force builds its work on the integration of the ongoing international, regional and national SD processes and ESD processes, considering the framework of the DESD and on the regional contributions to the DESD, such as UNECE Strategy for ESD with the Marrakech process. Additionally, the Task Force works on identifying and creating useful synergies among international and regional initiatives in order to strengthen the process.

Cooperation

To ensure mutual supportiveness, a strong cooperation among different Task Forces in particular between the Swedish MTF on Sustainable Lifestyles and the MTF ESC, which are complementary in the field of education, was established for the achievement of tangible outcomes.

Outcome

One of the outcomes of the work of the Task Force so far is – together with UNEP - the development of a working paper „Now and Here – Education for Sustainable Consumption - Recommendations and Guidelines"(2008) in collaboration with UNESCO and Hedmark University College in Norway, supported by the work of the Consumer Citizen Network and Consumers International, which has promoted the distribution of the paper at the first Global Consumer Day on Education for Sustainable Consumption.

Aim of the Working Paper on ESC

The aim of the working paper (which consists on three different documents: addressing the challenges, optimizing opportunities, relevant resources) is:

- to provide policy makers with a concept and instrument to understand the importance of ESC in supporting other policy goals such as citizenship and democratic participation, environmental protection or energy and climate policies
- to give policy makers guidance on how to integrate ESC into existing educational and sustainable development strategies
- to provide educators with concrete tools and instruments in order to include ESC in curricula.

Explanatory Note

The further explanations on the concept of ESC are drawn from this valuable work of UNEP and the MTF ESC. Furthermore, it provides an overview of show cases and good practices which could be used as reference to incorporate experiences within the respective trainings in the target countries to be come.

8.4.4 Make Education for Sustainable Consumption Happen

Starting points and objectives of ESC

Introduction

As stated, ESC is an issue of paramount importance to the United Nations and an essential dimension of the DESD. ESC is based on the principles of sustainable consumption and sustainable development. Its directly linked to many central issues

of society today and deals with challenges facing individuals everywhere, irrespective of the level of consumption and production of the country in which they live.

Therefore, ESC is an excellent starting point for education for sustainable development since it deals with issues people are concerned with in their every day life such as identity, food, energy, water, housing, transportation, communication, work, fashion, entertainment, tourism, etc.

Definition and Objectives

ESC consists of the acquisition of knowledge, attitudes and skills necessary for functioning in today's society. It is responsibility learning which aims to contribute to the individual's ability to manage his own life as well as participating in the stewardship of the global society's collective life.

Education for sustainable consumption is an interdisciplinary subject area focusing on contemporary events and conditions. Identifying the various elements is not as easy as examining traditional mono-disciplines which have long histories. One of the main reasons for this is that the technological, social and economic circumstances with which ESC is concerned change rapidly. New issues arise with each new scientific discovery. New social and political constellations require reflection by the students in order for them to understand the interrelationships of processes and systems.

This does not mean, however, that ESC is a vague collection of bits and pieces. With its concentration on the role of the individual, ESC deals with how each person interacts with the marketplace, society and environment. The consequences and impacts of individual choices and actions are important elements of ESC.

Learning Outcomes

Although the contexts and methodology used in ESC may vary, there are many common learning outcomes and competences. Identifying these competences and outcomes is an ongoing process which needs to move in tact with the changes in society which could be differentiated into

- basic learning outcomes
- generic competences and
- ESC subject specific competences.

Basic Learning Outcomes

The basic learning outcomes of ESC can be defined as attitudes, knowledge, skills and behaviour leading to:

- Critical awareness
- Ecological responsibility
- Social responsibility
- Action and involvement
- Global solidarity.

Generic Competences of ESC

Based on these basic learning outcomes, ESC encompasses more specifically the following generic competences, like:

- Appreciation of nature and of human diversity and multiculturalism
- Concern for justice, peace and cooperation
- Self-awareness
- Concern for quality
- Appreciation of the interrelatedness of individuals and society
- Capacity for empathy/compassion
- Ability to make critical, reflected decisions
- Ability to apply knowledge in practice
- Ability to cope with one's emotions
- Information management skills
- Capacity for generating new ideas
- Capacity to adapt to new situations
- Willingness an ability to be of service to others

- Ability to recognize global perspectives.

ESC Subject Specific Competences

To further operationalise the more generic competences, ESC includes the development of more subject specific competences which could be grouped into:

- attitudes (e.g. the realization of the complexity and often controversial nature of sustainable consumption issues)
- knowledge (e.g. how individual lifestyle choices influence social, economic and environmental development) and
- skills (e.g. define what one considers to be a good quality of life and to be able to identify the values upon which this is based)

Creating framework conditions for a better implementation of ESC

Actions on Several Levels Needed

To become better integrated in existing educational settings, ESC involves action on several levels:

- it consists of providing learning environments in which concrete actions support the goals of ESC initiatives
- it means creating structural frameworks within which ESC can be carried out
- it is also dependent upon the systematic training of teachers and the development of relevant research.

Concrete Actions

To address the interdisciplinary issues and the various context of formal education, and although life-long learning and professional training which are fundamental aspects of equitable, sustainable consumption and production, the following actions are needed to setup the right framework conditions for a better implementation of ESC:

Make Education System More Sustainable

The practical, daily decisions made in offices, schools and private homes can set the stage and provide encouraging examples of sustainable consumption to teachers and students. These decisions are made after having clarified the values and principles one stands for and considered how to manifest these in action. Small initiatives affirm the principles of sustainable consumption. They emphasize the applicability of ESC. Here, the educational system itself has to become more sustainable.

Include ESC in Established Curriculum

ESC cannot be expected to completely transform consumption habits but education can contribute significantly to the process. Experience indicates that there are various approaches to integrating ESC in educational systems, like:

- ESC can be mainstreamed as a topic taught as a part of existing subjects/disciplines.
- ESC topics can be taught as a cross-cutting interdisciplinary theme and/or incorporated into projects and other activities as well as in school clubs and after school activities.
- ESC can also be integrated into the curriculum as a specific subject, taught in specific periods in schools. Such subjects fall under the categories of: “global citizenship”, “future studies”, “life skills”, “stewardship of the earth”, etc.

Encourage Research

Research has already begun to generate knowledge about how to move toward a more sustainable global future. However, these insights have been primarily related to questions of sustainable production. There has been considerably less emphasis devoted to charting the transitions necessary to foster sustainable consumption and this previously neglected dimension still requires comprehensive investigation, like to promote improvements in quality of life, to distinguish long-term structural trends in

	consumption patterns, and to identify the social mechanisms and cultural aspects of consumer behaviour and household decision making. There is also a pressing need for more systematic investigation focusing on how to teach ESC.
Strengthen Connections	A wide variety of partners (governmental and civil society organizations, media, etc) exist with which educators can cooperate in order to improve the quality of the education for sustainable consumption. Building coalitions and partnerships between individuals and organizations working on issues of sustainable consumption can provide up-to-date bases of expertise upon which teachers and students can draw. It can contribute to the process of bringing ESC out of the classroom and into life outside of school. Connections can be established online as well as face to face. Such partnerships can stimulate initiatives within the local community.
Enhance Cooperation Between Professionals from Diverse Disciplines	Education for sustainable consumption is interdisciplinary – elements are to be found in different subjects of the curriculum. Central topics of environmental education, consumer education and civic training provide the backbone of education for sustainable consumption. Being a holistic topic dealing with all aspects of everyday life, ESC needs to develop integrated approaches that reflect the wholesome characteristic of life in general. It should highlight the connectedness and interdependency of the diverse aspects of our daily actions. Establishing a common understanding of ESC amongst teaching staff facilitates interdisciplinary cooperation and makes mainstreaming ESC in established subjects easier and to overcome fragmentation of the subject area.
Facilitate Teaching and Teacher-Training	Education for sustainable consumption is an essential part of education for sustainable development. The process of reorienting teacher training to address sustainability is an outstanding challenge facing institutions of higher education. The inclusion of training in ESC is equally essential due to both the present lack of focus on ESC in teacher training and the constantly evolving content of ESC. It needs to direct the attention of student teachers to existing alternative consumption patterns and lifestyles. Based on up-to-date scientific data, clearly identified values and practical application in real life situations, ESC can offer student teachers relevant training that they can use throughout their professions.
Reward Creative, Critical, Innovative Thinking	ESC requires in-depth, up-to-date understanding of the changing conditions which create the social and economic landscapes in which individuals function. Though it is highly unlikely that definite answers to all of the questions related to sustainable consumption can be found, it is possible to assist students by providing basic tools which enable them to deal with these questions creatively.
Importance of Indigenous Knowledge and Alternative Lifestyles	ESC respects diversity of culture and choice of lifestyle. ESC encourages listening to, learning from and caring for knowledge and ways of being which may be different from our own. By doing so, students can learn to reflect on, to see similarities and contrasts between and to gain valuable insights into other ways of understanding and functioning. ESC aims at finding viable solutions built on both innovation and traditional knowledge.
Foster Intergenerational Learning	Education for sustainable consumption is not only an activity for teachers and students alone. It is an important part of informal life-long learning and is carried on in the family, the local community and informal educational settings. It involves bridging gaps between generations by identifying common values, setting goals together and promoting interaction and cooperation at a community level. In this respect, ESC can be taught in part as community-involvement service projects. ESC is a means of stimulating constructive social activism.

Practical Steps Towards Implementation of ESC

Beside to setup the right framework conditions, progress towards sustainable development can also be significantly enhanced by a step-by-step approach. It is important, however, that ESC be identifiable so as not to disappear from focus. More intense learning would be expected in informal education settings and at institutions of higher education.

Additionally, it should be considered, that ESC needs strong visibility in the public and political arena. Therefore, governments can facilitate the development of ESC in their country, by

- setting up action platforms or networks (researchers, practitioners)
- building strategic partnerships for implementation with civil society organizations and business
- communicating and raising awareness of the added-value from ESC
- developing pilot and demonstration projects
- providing and sharing good practices
- establishing indicators of progress and
- implementing mechanisms for monitoring.

Themes and Issues Covered by ESC

ESC consists of many and diverse topics and issues, like:

- Life quality: values, needs, desires; human rights; ethical codes and spiritual principles; sufficiency and moderation, sustainable development; sustainable consumption
- Lifestyles: history of social and economic development; history of consumption; present social conditions; present consumption patterns; the symbolic roles of consumption; the role of the family; alternative lifestyles
- Resources: natural; human; financial; technological; organizational; interrelatedness of systems and processes; balances and imbalances
- Economics: economic models and practice; production and trade; multinational companies; social responsibility; savings, loans, investments; financial services and instruments; e-commerce
- Consumption and the environment: product life cycles and traceability; packaging; recycling, reusing, repairing products; energy; housing; transportation; communication; entertainment; tourism; climate, soil and water protection; biodiversity; waste management; ecological impact
- Consumer rights and responsibilities: laws and norms; agreements and contracts; consumer protection policies; transparency/accountability; complaints, redress, replacement, reimbursement; conflict resolution
- Information management: digital literacy; media literacy; advertising and persuasion; labelling; peer pressure; data based information systems; consumer support agencies
- Health and safety: food safety; genetic modified organisms; diet and nutrition; ecological, organic food; addictives; lifestyle illnesses and epidemics; HIV/AIDS; social services; product safety; labeling and quality control
- Change management: creativity and innovation; future perspectives; active citizenship; stakeholder involvement; community service
- Global awareness: global interdependence; energy, trade, commerce, agriculture, land use; poverty; human rights; labour rights; crime; precautionary principle; fair trade; Millennium Goals; world citizenship.

Explanatory Note

At this stage, it is not possible to give an overview on possibilities on how to integrate and present ESC themes in curricula development or in a specific didactical setting. For further reference on this please use e. g. UNEP/UNESCO YouthXchange training kit on sustainable consumption or the examples presented in the „Here and Now Guidelines on ESC“(see reference list).

8.4.5 Promoting Eco-labels through Education

Introduction

As stressed before, eco-labelling has become part of the various concepts of consumer education, education for sustainable development, or ESC. In the last few years, promoting eco-labels through the educational system gains more important, but it is still on a low stage, as experiences e. g. from Germany show. At present, eco-labelling is not systematic part of the formal educational system yet. Exemptions to this are in such cases, where schools have close cooperation with consumer organizations, or where a school setup actions to become a „green school". There are some indications, that eco-labels are also part of professional training programmes in the retail sector or part of special courses on environmental management or marketing in higher education.

Example

The Blue Angel goes to school („Der Blaue Engel macht Schule"):

Within their marketing activities, the Federal Ministry for the Environment in collaboration with the Federal Environmental Agency and the Eco-labelling Board of the Blue Angel developed school materials to be used in primary and secondary school to raise awareness and basic knowledge of eco-labelling and related issues, like environmental problems, sustainable products and environmental product policy which relates to the daily reality of the students and age groups. The materials consist of various modules and methodological approaches to be used by teachers as part of a so called „project week", covering between 5-10 learning hours. The materials were delivered to every school authority in the federal states for further distribution in the schools. Additional, the materials are available on the Ministry's web-server on environmental education which is heavily frequented by teachers. (www.blauer-engel.de)

Example

In the last few years, promoting eco-labels through education has become of some strategic value in integrative marketing activities, that means, schools and school administrations were identified as strategic partner or target group in wider communication and awareness raising campaigns, like on the promotion of environmental friendly school material, or on climate change.

Good examples for this approach are campaigns on the "Ecological School Start" in which governments, school authorities, schools and retailers implement multi-channel marketing and school activities.

Eco-label for Schools

Additionally, in the case of Austria, the introduction of an „eco-label for schools "forms another approach to strengthen the interrelation of eco-labelling and education.

In 2002, the Austrian Ministry for Agriculture, Forest, and Environment in collaboration with the Ministry for Education and Culture launched the national eco-label for schools. The objective for this activity is to create a visible sign for schools which are engaged in school greening activities and environmental education, but also in activities to create a positive „social environment "within the school.

The criteria consist of the following aspects:

- environmental management, information and social aspects
- education for environment
- health protection, ergonomic and indoor quality
- energy use and savings, construction
- transport and mobility
- procurement and school materials
- food and canteen
- chemical products and cleaning
- water use and waste water, waste reduction

- outdoor area.

The criteria are based on a point system and divided into mandatory and voluntary criteria.

In the year 2008 an additional eco-label for adult educational institutions were launched to support the promotion of the concept of education for sustainable development and the application of environmental management in these institutions. (www.umweltzeichen.at)

8.4.6 Conclusion and Discussion

Conclusion

To further consider the strategic value of education to promote sustainable consumption and lifestyles, but also the widespread of eco-labelling, the following conclusion can be drawn:

- the concept of sustainable development means to meet the challenges of education and sustainability
- on the political level the centrality of education to achieve sustainable development is widely recognised, but still lacking adequate implementation
- within the Decade on Education for Sustainable Development a broad concept understanding of education for sustainable development was developed and the practical implementation on international, regional and national levels improved
- sustainable consumption and lifestyles are key issues to be addressed by ESD, but adequate implementation is still to vague
- there is a urgent need to further streamline and integrate the issue of sustainable consumption and lifestyles in political and practical terms
- to change the framework conditions and to facilitate better integration of education for sustainable consumption into the educational system the Task Force on ESC within the framework of the Marrakech process was established and has led towards an operational understanding of the needs, objectives, and practical approaches
- eco-labelling is recognised to be an issue within ESD or ESC, but application needs further improvement
- there are positive approaches to promote eco-labelling through education by providing guidance and practical solutions for better integration in educational systems, but further more through integrative forms of strategic marketing or the setup of an eco-label for green schools and educational institutions
- there are some possibilities to strengthen the strategic partnership between eco-labelling bodies and the educational system as part of capacity building, like e. g. with universities or training institutions.

Further References

UNESCO website on Decade on Education for Sustainable Development

http://portal.unesco.org/education/en/ev.php-URL_ID=23295&URL_DO=DO_TOPIC&URL_SECTION=201.html

UNESCO website on Education

http://www.unesco.org/en/education

Website of the Marrakech Task Force on Education for Sustainable Consumption

http://esa.un.org/marrakechprocess/tfedususconsump.shtml

UNEP project website on Education for Sustainable Consumption

www.youthxchange.net

UNESCO's toolkit on ESD

www.esdtoolkit.org

Consumers International Consumer Education Toolkit:

www.ciroap.org

OECD Education at a glance 2008:

http://www.oecdbookshop.org/oecd/display.asp?CID=&LANG=EN&SF1=DI&ST1=5KZN0WRKCDTG

Further reading

Working paper „Now and Here – Education for Sustainable Consumption) from UNEP and the Marrakech Task Force on Education for Sustainable Consumption (2008).

8.5 Role of Consumer Organizations to promote SCP and Eco-labelling

8.5.1 Introduction

Challenge

Within the debate on SCP, it is broadly acknowledged, that in order to reach the goal of shifting towards sustainable consumption and lifestyles, the involvement of all societal actors – government, business, civil society, and research – is needed. Especially the role of civil society is considered crucial for the implementation and mainstreaming of ambitious sustainability approaches, like SCP or IPP.

Civil Society as Strategic Partner

But, many political frameworks, implementation programmes and activities so far not yet consistently involve civil society resp. organizations that represent the interest of civil society as strategic partners for the promotion of sustainable consumption and production patterns. Normally, citizens and civil society are often targeted by policies in a very unspecified way (mostly as consumers of products and services or the general public), but do not anticipate them as strategic actor on its own right with special needs, rationalities, capacities and capabilities.

It became evident, that policies and programmes (not only on SCP) which do not adequately address and enhance the involvement of civil society (partners) into the political and implementation process risk a high potential for failure. If people do not understand the need for change, and the related steps taken by politicians to introduce policies and measures towards a modernisation of society, how can they expect to receive the needed support for the various policy reforms associated with sustainable development?

From Government to Governance

Therefore, within political science modern environmental and sustainability policy is more and more conceptionalised as move towards new “governance models and structures“ with participation and cooperation as strong strategic element in policy-making for sustainable development. It is increased recognised, that the civil society's potential to realise the needed reforms towards sustainable development is much higher then normally expected.

The crucial question in this respect lies on how to mobilize the „sleeping capital“ of

civil society to become a strong promoter towards sustainable development in general, and more specific, towards the further mainstreaming of sustainable consumption and production.

Triangle of Change

To become practical effective, policies towards sustainable development in general (and specific on SCP) require a good understanding of the different roles of the various actors, descript in the “triangle of change“ which stressed the need to develop an integrative policy approach to activate and mobilise business and civil society to become actively involved in SCP policies and actions, but also to create a strong social commitment and movement for a sustainable future.

Learning Objectives

The learning objective of this section is to give a basic introduction of the role of consumer organizations to promote sustainable consumption and eco-labelling.

Content of this Section

This section:

- specifies the challenge and strategic role of civil society in SCP policy
- provides overview on the international policy framework for consumer protection and sustainable consumption
- identifies fields of actions for consumer organizations to promote sustainable consumption and eco-labelling
- outlines needs for further improvements and capacity building.

8.5.2 Civil Society: A Stronge Change Agent for SCP?

Shortcomings of Current SCP Policy

In this respect, the challenge of SCP policies lies in the need to overcome several shortcomings of policy making in modern lifestyle societies, anticipating much better the social dynamics within these societies to shape policies which supports existing dynamics and not counter-acting them in a way, that make it impossible for the people to meet the challenge of sustainable development in their daily life (the “dilemma of the sustainable consumer“).

Overcoming the Instrumentalism

This understanding requires a more innovative approach towards SCP policies that goes far beyond the often discussed instrumentalism. To activate the potentials of civil society as change agents for sustainable development in general, and for sustainable consumption and production in specific, policy-making in this field should contribute to the following objectives:

- provide and deliver a basic understanding on the need for change which helps the people to get a clear orientation on the societal goals and the future pathways towards the practical realisation of sustainable development
- develop and provide the needed capacity building and knowledge transfer to practical enable the people to adequately act in their various roles as consumers and citizens (strong link to education for sustainable development)
- provide differentiated incentives and opportunities for the people to become actively engaged in the implementation of sustainable development practices within their social environments
- create cultures of sustainability within society to become agents for technical, economical, social and institutional innovations to overcome various barriers and dilemma.

Evidence Base

These objectives for a new (or complementary) type of SCP approach, which goes beyond the traditional instrumental approach, are based primarily on results from social science based research programmes, like the UK SCP evidence

programme, or the German Research Programmes on Socio-Ecological Transformation, but also from European Union funded research projects on SCP (like Scope, ASCEE etc.) and others.

The research stressed the general facts:

Social Behaviour and Cultural Settings

Consumers are too often targeted by policies as individuals, which do not take into account, that sustainable consumption practices and lifestyle changes rely much more on social behaviour and cultural settings (in terms of institutionalized norms and structures) which are supportive to the people then on individual decision making or purely economic rationalities.

Overcoming the Social Dilemma

Furthermore, the results show clear evidence, that people are much more motivated to become actively involvement, if they know that others (like business, governments and politicians) are also committed to make the needed change overcoming the social dilemma to become a „social looser" when acting in a sustainable manner.

Mainstreaming

The implementation of instruments, like eco-labelling, needs further embedment in new forms of communication and social settings that goes beyond traditional forms of consumer information, marketing and advertisement to outreach and mainstream the proposed impacts.

New Type of Political Consumerism

Especially in the upcoming of a new type of „political consumerism" (like LOHAS), identified by social scientist in the last couple of years, which could form some new grounds and potential for widespread change in the direction of SCP, requires innovative approaches of communication, information and action formats, based primarily on the Internet.

Two Crucial Questions

The crucial question on the interactions between SCP policy-making and civil society is twofold:

- how to set up a SCP policy that meets the special needs of civil society?
- how to define the role of civil society to make policy implementation more effective towards sustainable development/sustainable consumption and production?

8.5.3 The Role of Consumer Organizations in Modern Society

Background

Nowadays, consumer organizations have become a phenomenon of the modern society. Within social theory, modern societies are often descript as "consumer society", which means, that since the Industrial Revolution societies were undergo dramatic changes in social, political, economical, technical and cultural terms which lead to the social phenomenon of "consumerism" commonly characterised by mass production and consumption and a strong orientation towards a market or consumer culture associated with a general process of democratisation.

Social Movements for Alternative Forms of Living

Within this context of social change, a critical debate on the negative impacts on these developments arose (Thorsten Veblen) by the mid/late 19th century which forms the foundation for a social movement towards alternative forms of living and consumption (anti-consumerism), but also towards the promotion of consumer interests, rights and protection („let the buyer beware"). Here, consumer co-operatives formed one of the early social movements to overcome harsh living

conditions and inadequate consumer protection, followed by other forms of institutions and social organizations in this field. While consumerism is not a new phenomenon, it has become widespread over the 20th century and particularly in recent decades, and forms the background of the field of consumer policy today.

Consumer Policy

An important milestone in the development of consumer rights and protection on the global level was the adoption of the UN Guidelines for Consumer Protection by the General Assembly in 1985. The guidelines provide a framework for Government, particularly those of developing countries, to use in elaborating and strengthening consumer protection policies and legislation.

They are also intended to encourage international co-operation in this field. The origins of the guidelines can be traced to the late 1970s, when the UN Economic and Social Council recognized that consumer protection had an important bearing on economic and social development and environmental protection.

UN Guidelines for Consumer Protection 1985

The objectives of the adopted UN Guidelines for Consumer Protection are:

- to assist countries in achieving or maintaining adequate protection for their population as consumers
- to facilitate production and distribution patterns responsive to the needs and desires of consumers
- to encourage high levels of ethical conduct for those engaged in the production and distribution of goods and services to consumers
- to assist countries in curbing abusive business practices by all enterprises at the national and international levels which adversely affect consumers
- to facilitate the development of independent consumer groups
- to further international cooperation in the field of consumer protection
- to encourage the development of market conditions which provide consumers with greater choice at lower prices.

Principles and Actions

The guidelines outline a wide spectrum of principles and actions on capacity building in the field of consumer protection (including environmental protection and the efficient use of resources) to meet the following:

- the protection of consumers from hazards to their health and safety
- the promotion and protection of the economic interests of consumers
- access of consumers to adequate information to enable them to make informed choices according to individual wishes and needs
- consumer education, including education on the environmental, social and economic impacts of consumer choice
- availability of effective consumer redress
- freedom to form consumer and other relevant groups or organizations and the opportunity of such organizations to present their views in decision-making processes affecting them.

Sustainable Consumption as Part of the UN Guidelines

In 1999, the UN Guidelines on Consumer Protection were extended by the General Assembly towards the issue of sustainable consumption. The guidelines outline a wide spectrum of actions in the field of consumer protection and capacity building (including environmental protection and the efficient use of resources) and specify measures to further promote sustainable consumption, based on shared responsibility by all members and organizations of society, like (amongst many others):

- develop policy frameworks for sustainable consumption
- safeguard public participation
- use policy mix
- promote eco-efficient, safe and healthy products (eco-design)

- encourage impartial environmental testing of products

Level of Implementation of the Guidelines

In the preparation to the Johannesburg Summit 2002 UNEP in collaboration with Consumers International launched an international survey on the level of implementation of the UN Guidelines for Consumer Protection related to the proposed actions in the field of sustainable consumption. The results of this survey and the recommendations made by UNEP and Consumers International gave impetus to the further outline of the Plan of Implementation (chapter 3).

Consumer Organizations and the Marrakech Process

As a follow-up of the Johannesburg Summit, consumer organizations has also become part in the further development of the 10year framework of programmes on SCP (Marrakech Process), where Consumers International are functioning as representation for all Civil Society Organization within the Steering Committee of the Marrakech Process to contribute to the preparation of CSD 18/19, wherein the improvements on the global level towards SCP will be monitored and evaluated in 2010/2011.

8.5.4 Institutionalization of Consumer Protection on the International, European and National Level

Introduction

Consumer protection and policies in the interest of the consumers has become widely institutionalised today. Beside governmental institutions on consumer protection, consumer organizations play a vital role all over the world to stress the need for a better policy-making in the interest of consumers.

Important consumer organizations on the international and European level are:

Consumers International (CI)

Consumers International is an independent, global federation of consumer organizations with over 220 members in 115 countries. The mission of CI is to build a powerful international consumer movement to help protect and empower consumers everywhere, and a world where people have access to safe and sustainable goods and services, exercising their individual rights as consumers, and using the force of their collective power for the good of consumers. Here, CI is acting primarily in the field of international policy-making, capacity building, campaigning and dialogue on the global level on various issues. Important field of action are: competition, consumer information and education, consumer protection, Corporate Social Responsibility and standards, drug marketing, financial crisis, trade, food, Intellectual Property Rights, and sustainable consumption.

WWF

WWF – World Wildlife Funds: Founded in 1961, the WWF is on of the largest conservation organization in the world with over 90 offices in 40 countries.

Friends of the Earth

Friends of the Earth is a global action network of grassroots groups in over 77 countries to create a healthy, just world, acting on several fields, like global warming, healthy people, energy, transportation, air and water.

Greenpeace International

Greenpeace International is an independent global campaigning organization that acts to change attitudes and behaviours, to protect and conserve the environment and to promote peace. Greenpeace International is working on issues, like energy, oceans, forests, disarmament and peace, toxics, and sustainable agriculture.

European Level

On the European level, there are several consumer (umbrella) organizations to defend the interests of the nearly 500 million consumers within the European Union, either generally or by specializing in a specific area of consumer interests. They form also an important part of the consultation process in the preparation of EU policies. The most important consumer organizations on the European level are described below.

BEUC

The Bureau Européen des Unions des Consomateurs is the largest and most important association of European consumers. It is composed of independent national consumer organizations. Its mission is to protect European consumers' interests in the creation of EU policy. Strategic fields of work are: consumer contractual rights, consumer protection in the information society, consumer safety, energy and sustainability, financial services, group actions, healthy food for informed consumers, healthcare.

EEB

The European Environmental Bureau is a federation of citizens' organizations with over 143 members in 31 countries throughout Europe. The mission of EEB is to promote environmental and sustainability policy in the European Union and to promote knowledge and understanding of the current and potential EU environmental and sustainable development policies amongst the general public, so that this will lead them generally to mobilise for continuous improvement. The EEB has consultative status at the Council of Europe and the United Nations, and has working relations with the Commission of the European Union, the Economic and Social Committee of the European Union, and the OECD. The fields of activity cover the whole spectrum of environmental and sustainability policy.

AEC

The Association of European Consumers is an association of European national consumer organizations that specializes in raising social and environmental awareness in various fields.

ANEC

The European Association for the Coordination of Consumer Representation in Standardization is a rather different organization. It focuses attention on consumer participation in standardization on a European scale. Priority fields of activities are given to: Child Safety, Design for All, Domestic Appliances, Environment, Information Society, Services and Traffic.

Euro Coop

Members of the European Community of Consumers Cooperatives (Euro Coop) are national consumer organizations from 18 European countries, with over 3.200 local and regional co-operatives. Activities are concentrated mainly on consumer issues (like food policy, environment policy and sustainable consumption, consumer information and education), but also on co-operative issues (like EU enlargement, EU funding, representation of the co-operative sector).

European Consumer Consultative Group

The European Consumer Consultative Group is a forum for general discussions on consumer interests. It publishes remarks on Community affairs affecting consumer protection. It provides advice and recommendations to the Commission in the formulation of policies and other activities that affect consumers. It informs the Commission of developments in consumer policy in Member States. The group is composed of one member representing national consumer organizations and one member from each European consumer organization. The European Consumer Consultative Group was set up in accordance with Commission

Decision 2003/709/EC.

National Level

Related to the information provided by Consumers International, there is a large variety of consumer organizations setup in the regions and on the country level which cannot be covered at all. Normally, a national consumer council or consumer federation coordinates the work on the national level, keeping in mind of the different legal frameworks, political systems, objectives and organizational structures.

Fields of Actions

Due to this diversity of organizations and structures, it is difficult to specify one common understanding on what a consumer organization is all about. However, related to the common objectives of consumer protection, the activities of consumer organizations could be characterised in general as follow:

- shaping the policy agenda and the policy design (including legislation)
- support policy implementation
- capacity building
- consumer information and education
- campaigning and networking
- strategic cooperation with governments and business
- consumer research.

Multiple Roles of Consumer Organizations

Against this background of understanding, consumer organizations play a multiple role within modern society, based on the fact, that the traditional role of consumer organizations (protection of consumers) is more and more transferred into a modern form of a wider empowerment approach to help consumers to meet the challenges of modern society, including the challenge of sustainable consumption.

There is some evidence in policy science, that the change of role of consumer organizations is strongly associated with the overall structural change of society.

On the one hand, consumer organizations are strongly effected by societal changes (like liberalisation of markets, socio-demographical development, globalisation, societal differentiation and polarisation, emerging risks, changing consumer's perceptions).

On the other hand, consumer organizations became „strong“ political drivers to influence to some extend the political agenda towards the interest of the consumer as overall aspect of democratisation of the political system, but also to be increased recognised from politicians and governments to become a promoter for several political objectives, including sustainable development and environmental policy.

Explanatory Note

At this point, it goes too far to explain the co-evolution of consumer organizations, the political system and the dynamics of modern societies. Generally, it could be observed that in the last decade the institutionalisation of the „consumer's interests“ made important progress, not only in developed countries, based on a more and more globalised movement which relies increasingly on the introduction and distribution of new communication techniques and media. The consumer movement became itself a phenomenon of globalization in this respect, acting through global campaign formats, networks and institution building.

8.5.5 Consumer Organizations as Strategic Partner for SCP Policy and Implementation

SCP as Challenge for Consumer Organizations

Within civil society, consumer organizations are crucial to become involved in SCP policies and implementation. Beside the traditional aim, to act in the interest of consumers, the question of sustainable consumption and production emerged over the years as issue number one for international cooperation and joint action, based on an international survey within 115 Member Countries launched by Consumers International (CI) in 2006.

Integrating SCP

The issue of sustainable consumption and production has become to some extend an integrative part of the overall work of consumer organizations. It was increasingly recognised that the promotion of sustainable consumption lies in the core interest of consumer protection which needs special attention and further capacity building on the international level to overcome the various environmental impacts and social disparities from (over)consumption.

As stated by Consumers International, inequality and deprivation are increasing at an alarming pace and disparities in income and consumption has become a feature in all countries. Here, it has become obvious for consumer organizations that the promotion of sustainable consumption is not only an answer on the environmental impacts, which are distributed unequally, but also an answer to the needed question to overcome the social justice gap within society and globally. Therefore, consumer organizations could be seen as promoter towards a wider interpretation and application of the SCP concept, including the need for more radical changes, like institutional and social innovations.

Consumers International Approach

Consumers International's work in the area of sustainable consumption focus on holding to account:

- Corporations by exposing the connections between corporate activities and violations of human rights, corruption, and environmental destruction and the products and services those reach the end consumer.
- Governments for the implementation of progressive sustainable consumer protection policies in line with the UN Guidelines for Consumer Protection.
- providing consumers with independent, clear and transparent information in relation to sustainable consumption, through:
  - targeted awareness-raising campaigns
  - consumer education and
  - working with its global membership to communicate the impact of consumer choice in markets with globalised commodity chains.
- Deliver appropriate capacity building activities for its members so that they are better equipped to engage with sustainable consumption issues at the local level

Special Need on Capacity Building

To fulfil the multiple roles and to meet the various objectives outlined in the UN Guidelines for Consumer Protection, capacity building within consumer organizations has become a crucial factor, especially in developing (but also to some extent in developed countries). As stated by Consumers International, more than 75% of Consumers International's members are in developing countries where constraints in institutional frameworks and resource mobilisation can pose a challenge to emerging organizations. To develop strong and effective consumer organizations by building the knowledge and skills that can impact on policy-making at national and global levels capacity building is supported through:

- training programmes
- seed grants
- technical assistance

- information networks
- exchange programmes, and
- joint projects.

The activities towards capacity building are normally organised in different ways, like

- country-specific programmes (which support a spectrum of activities)
- thematic-specific issues (which support the awareness and integration of emerging issues into the work of consumer organizations)
- cross-cutting issues (which support managerial skills).

Financial Constraints

As financial constraints are seen as one of the bottlenecks to further outreach the work of consumer organizations, searching for additional funding opportunities (fundraising) has become more and more important over the time. Beside governmental contributions and self-financing through membership contribution, there are several models in place to strengthening the financial baseline for consumer organizations, like:

- venture capital and public-private-partnerships
- providing new services
- project funding from foundations (public, government, business)
- campaigning and
- development assistance programmes.

Fields of Capacity Building

Within the area of sustainable consumption, consumer organizations provide various actions and capacity building activities. Examples from Consumers International are described below.

Climate Change

Study „What assure Consumers on Climate Change“ (2007) in collaboration with the research organization AccountAbility on the attitudes of consumers in the US and UK towards climate change, stressing the fact, that corporate and governmental efforts to inform consumers about climate change are often failing, and recommends on how, by working together with civil society organizations, governments and corporations can still persuade consumers that they can make a positive difference on climate change.

Education for Sustainable Consumption

Understanding the impact of consumption choices is a vital part of securing a safe and sustainable future for all. That is why Consumers International is working towards getting sustainable consumption (SC) to be part of the curriculum in every classroom. Consumers International's action in collaboration with UNEP and the Marrakech Task Force on Education for Sustainable Consumption concentrates mainly on the development and adoption of the „Here and Now Guidelines“on Education for Sustainable Development (explained under 8.4) to become part of the 10year framework of programmes on SCP, and also part of national curricula. Furthermore, Consumers International organised the first Global Consumer Action Day on Education for Sustainable Consumption on 15 October 2008 with more than 40 members and other organizations in 33 countries to raise public awareness on the need to further integration of sustainable consumption in the formal and non-formal education.

Ethical Consumerism

Consumers International has long recognised that meeting the needs of tomorrow’s consumers will depend on a shift towards more sustainable consumption patterns today. To overcome the „dilemma of the ethical consumer“ to move forward to make pro-development and pro-environmental choices in their everyday action, based on ethical claims, Consumers International launched

studies on the challenges for consumers when trying to decide between ethical and unethical products in the “Sustainable Coffee Sector“ and on “Green Food Claims“.

Additionally, Consumers International supports the development of an important new type of ISO standard on social responsibility **(**ISO 26000), one that looks beyond product safety and reliability to the social impact of production and how organizations that claim to be socially responsible give feedback to consumers. The aim is to give consumers more information about their purchasing choices and to work with partners on understanding and raising public awareness of what assures consumers in ethical purchasing.

Campaigning Corporate Accountability

Within its campaigning format on corporate accountability („The Real Deal“) Consumers International in collaboration with DanWatch started a web based media campaign to address the dumping of e-waste in developing countries (especially with focus on West Africa). The objectives are to raise awareness on the environmental and health risks related with e-waste, and strengthen legislation, to encourage recycling and to shift responsibility to manufacturers so that they take back old products for safe disposal.

Examples in the EU

Within the European Union, there is a wide spectrum of actions implemented by consumer organizations related to the promotion of sustainable consumption, starting from political and awareness raising campaigns and joint implementation project in strategic partnership with governments and business, to the implementation of information portals and consumer education on various issues.

EEB – Spring Alliance

The Spring Alliance is a participatory movement, launched by EEB and European social partner organizations in July 2009, to ensure that the European Union puts people and the planet first in the light of the upcoming revision of the EU Sustainability Strategy in 2010. The Alliance is broadly supported by different civil society organizations, like consumer organizations, development NGO's, Fair Trade movement, anti-poverty-campaigners, and from research. Based on a “Manifesto“ the Alliance recommends 17 proposals for a more sustainable European Union and list concrete steps that illustrate how decision makers can turn the proposals into reality. Proposals are made on the following issues: governance and democracy, environment and ecosystems, inclusive society, (green) jobs, global responsibility.

Civil Society Platform for SCP

Based on the fact, that involvement of Civil Society Organizations to shift towards SCP is crucial, the European Commission funds a project within the 7th Framework Research Programme, which is carry out by the UNEP/Wuppertal Collaboration Centre on Sustainable Consumption and Production (CSCP), the Regional Environmental Centre (REC), and the Centre for Sustainable Design (CfSD), to enhance the involvement of civil society organizations in SCP issues, focussing on the areas of food, housing, and mobility. The project will give the organizations a space for identifying research needs and influencing political decisions on SCP. In addition the project provides information on the actual policy frameworks (like EU Action Plan on SCP/SIP) and related measures in order to make participation in these kinds of processes more accessible. A wide range of civil society organizations from all European countries are invited to take part in the various inter-active formats of the platform.

UK National Consumer Council (NCC)

Greening the supermarket: Supermarket chains have a great potential to influence the consumption choices of consumers by e. g. offering sustainable products and providing needed information. Supermarket chains assure that they work on

reducing their environmental impacts and offering sustainable alternatives to consumers, but in many cases it is not clear what the actual scope of their actions is. The UK National Consumer Council (NCC) assessed the environmental performance of UK-based supermarkets by going into the stores and listing their performance in food, transport, waste prevention, sustainable sourcing and sustainable farming. The supermarkets were also asked directly about their actions on these fields. In many cases the statements of the supermarkets and the situation in real life were contradictory.

8.5.6 The Involvement of Consumer Organizations in Eco-labelling

Introduction

Within eco-labelling, consumer organizations could play an important role. Here, several fields of action could be outlined:

- consultation of policy design for eco-labelling
- stakeholder representation in eco-labelling board
- participation in criteria development
- strategic partner in the promotion of eco-labelling within public campaigns
- competent and verification body
- product testing of eco-labelled products
- consumer information and education
- campaigning
- CSR and eco-labelling.

Consultation of Policy Design for Eco-labelling

Consumer organizations became often part in the political process to setup adequate policy frameworks for eco-labelling. Here, consumer organizations often give the political stimulus to setup eco-labelling schemes.

Stakeholder Representation in Eco-labelling Board

In most of the existing eco-labelling schemes consumer organizations are important stakeholders within the institutional setting of eco-labels, like eco-labelling board, committees. There is clear evidence, that the success of an eco-label in terms of public recognition and reputation relies much on the presence and active involvement of consumer organizations in the decision-making process.

Participation in Criteria Development

Due to their special expertise consumer organizations provides valuable input into the criteria development process. Here, consumer organizations are often functioning as good resource on critical impacts from products, based on own research, which are often not provided by industry. Therefore, consumer organizations help to build up a good knowledge base for eco-labelling and safeguard to some extend the needed plurality of information.

Promotion of Eco-labels

Consumer organizations are often initiating public campaigns on eco-labelling or become active part of governmental financed promotion activities (see marketing). Due to their structure and networks, consumer organizations are good distribution channels for various issues related to eco-labelling.

Competent and Verifying Body

In some countries, like Austria, consumer organizations are the running body of the eco-label scheme, functioning as competent and/or verifying body. Here, the eco-label itself is part of the institutional structure of the consumer organization. Normally, the task to function as competent and verifying body is delegated by the government (as owner of the eco-label).

Independent Product Testing

Consumer organizations play a key role to setup independent product testing. Independent product testing forms the backbone of consumer's confidence. Without independent product testing it is difficult to obtain qualified information on the impacts and performance of products at the market, which is needed to have a good baseline for criteria development or to verify the performance of eco-labelled products compared to other products in the same category (comparative testing).

Consumer Information and Education

Consumer organizations are valuable partners to implement complementary measures in the field of consumer information and education. Here, consumer organizations provide valuable tools and activities to help consumers to better understand the functioning of eco-labelling. Additionally, consumer organizations are often contacted by consumers as source of information on the various types on (eco) labels and their level of confidence.

Campaigning

As outlined earlier, one basic function of consumer organizations is to sensitise the general public on emerging issues and to mobilise political support.

CSR and Eco-labelling

In recent years, consumer organizations have started to give consumers more transparent information on the CSR performance of companies. Here, consumer organizations have developed own award schemes or integrate CSR related issues as one part of other activities, like product testing.

8.5.7 Conclusion

Important Points

Important points in this section are:

- the role of civil society to move towards sustainable consumption and production could be seen as crucial
- within policy making on SCP the role of civil society is often underestimated or not adequately addressed
- to proper address civil society within SCP policies a broader approach of empowerment is needed which goes beyond traditional environmental instruments
- to increase the outreach of SCP related policy the involvement of civil society/consumer organizations is key, either in the policy design and the implementation
- capacity building within these organizations is a requirement to better facilitate sustainable consumption practices and to build strong strategic partnerships in the implementation of activities
- within eco-labelling the various functions of consumer organizations need to be better addressed and further strengthen.

Useful Links

UN Guidelines for Consumer Protection:

http://www.un.org/esa/sustdev/sdissues/consumption/cpp1225.htm

Consumers International: http://www.consumersinternational.org/

BEUC: http://www.beuc.eu/Content/Default.asp?

EEB: http://www.eeb.org/

WWF http://www.wwf.org/

Greenpeace International http://www.greenpeace.org/international/

Friends of the Earth International http://www.foei.org/