

ANEC on crucial goals for the 7th Environmental Action Programme

This summary should be considered together with [ANEC final response¹ to the consultation on EU environment policy priorities for 2020: Towards the seventh EU Environment Action Programme](#).

Interrelation of health and environmental concerns

Having in mind the important role the EAPs have in guiding environmental policy, European Consumer organisations stress the need to address environmental issues without ignoring interrelated health issues.

In this perspective, ANEC considers the current European legal framework regarding chemicals in products insufficient in ensuring an appropriate level of safety to consumers and the environment.

The 7th EAP should focus strongly on hazardous chemicals in consumer products including nanomaterials and endocrine disrupters.

With this respect, flaws in existing European legislation (e.g. Toy Safety Directive, REACH, GPSD) show that there is no community approach to address chemicals in consumer products in a consistent systematic manner. REACH for example cannot serve this purpose. In particular, although REACH Regulation assesses many chemical substances, possibly placing them subject authorization, it does not apply to many substances contained in everyday consumer products. Moreover, many requirements of REACH do not apply to imported articles.

Chemical requirements that are provided in the legislation lack ambition. Generic safety provisions can be too vague for producers to interpret and comply with. When already present in product specific legislation, general provisions need to be complemented by clear cut restrictions to substances of concern to be best adapted to the risk to human health.

A new European horizontal legal approach is needed which ensures that consumers will only consume products which are safe.

Other important priorities

Further changes needed in specific economic sectors are for example strong incentives for public transport to be chosen over private transport. Only an efficient public transport will encourage a reduction of the private car fleet.

¹ The response was developed in collaboration with BEUC, The European Consumer Organisation (www.beuc.eu)

In the housing sector, ANEC believes the following important initiatives should be promoted: thermal insulation of the building stock; the extension of service life of buildings and building products; design for recycling and limitation of land use change for new buildings.

Learning from past mistakes and making a positive change for society and environment

Consumer organizations would like the European Commission to take the ambitious role of leading a change in the economic system, with a view to change of the mindset on economic growth. For long, a race towards infinite growth has been a major policy objective of the Commission and Member States, with poor consideration of the finiteness of resources of our planet.

Integration of policies

It is important that policies foreseen in the 7th EAP are consistently interlinked and integrated. The SCP policy for example should take in hand other community policies that entail unsustainable developments - such as the Common Agricultural Policy and Common Fisheries Policy - and come within the scope of the resource efficiency flagship initiative. However, while we welcome resource efficiency has been made a priority by the Commission, the lack of setting targets is the main loophole of the Commission' strategy towards resource efficiency. A weakness of the current EU sustainable product policy is its major focus on energy efficiency. Other important aspects such as resource efficiency, recyclability, re-usability, waste and hazardous chemicals are often left out. These shortcomings ought to be addressed, allowing thus an increase of environmental performance of products and addressing the most relevant environmental aspects for each product category.

Resource overconsumption must be tackled by reduction of consumption through regulatory measures to prolong the service life of products: for example by increasing warranty periods, prescription of reuse packaging, etc.

We would like to see regulatory action in the first place, complemented by tax incentives.

When looking at the new EU programme for research and innovation, European consumer organizations stress the need to rethink at how innovation nowadays often leads to outdated products at an increasing speed of creating new demand (see ICT sector).

Businesses are also under constraints of competitive markets. Therefore, regulation should set clear and ambitious targets while providing taxation and fiscal incentives encouraging green and sustainable private procurement.



ANEC believes a sustainable European Internal Market can only be realised if truly citizen-centred, putting people and environment first.

APPENDIX – About ANEC

ANEC is the European consumer voice in standardisation, defending consumer interests in the processes of technical standardisation and conformity assessment as well as related legislation and public policies. ANEC was established in 1995 as an international non-profit association under Belgian law and represents consumer organisations from 31 European countries. ANEC is funded by the European Union and EFTA, with national consumer organisations contributing in kind. Its Secretariat is based in Brussels.

ANEC has signed the European Commission's Register of Interest Representatives and accepted its Code of Conduct: Identification Number 507800799-30.

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More information about ANEC and its activities is available at www.anec.eu

Should you have any problems in accessing the documentation, please contact the ANEC Secretariat.

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