Public consultation on the EU product policy

> Fields marked with * are mandatory.

Introduction

In 2015, the EU adopted the Circular Economy Action Plan. One of the actions in that plan is to analyse the existing framework of EU policies for products. The wide range of products on the EU single market are subject to many different EU policies that vary in scope, type and approach. These policies include different forms of legislation, guidance and financial and/or market incentives. They have various policy aims such as ensuring the safety of people that use or consume the products, maintaining fair competition on the EU internal market, climate change mitigation, protecting the environment, providing consumer protection and promoting more sustainable products. While these aims are consistent with circular economy generally, the policy tools have been developed in their own context, without necessarily taking into account the transition that the EU is making to a low carbon, circular economy.

In this work we aim to focus on product categories where available evidence indicated there is high potential for circular economy, and on EU policy tools that are capable of and/or already addressing that potential, partly or fully. The contributions to this public consultation will be used by the Commission when preparing a Commission Staff Working Document containing the analysis of in how far EU product policy tools are facilitating the transition to the circular economy and possible gaps or obstacles that hinder the objectives to be achieved.

About you

* Language of my contribution
- ○ Bulgarian
- ○ Croatian
- ○ Czech
- ○ Danish
- ○ Dutch
- ● English
- ○ Estonian
- ○ Finnish
- ○ French
- ○ Gaelic
- ○ German
- ○ Greek

- ○ Hungarian
- ○ Italian
- ○ Latvian
- ○ Lithuanian
- ○ Maltese
- ○ Polish
- ○ Portuguese
- ○ Romanian
- ○ Slovak
- ○ Slovenian
- ○ Spanish
- ○ Swedish

*I am giving my contribution as
- ○ Academic/research institution
- ○ Business association
- ○ Company/business organisation
- ● Consumer organisation
- ○ EU citizen
- ○ Environmental organisation
- ○ Non-EU citizen
- ○ Non-governmental organisation (NGO)
- ○ Public authority
- ○ Trade union
- ○ Other

*First name

Michela

*Surname

VUERICH

*Email (this won't be published)

mvu@anec.eu

*Organisation name

255 character(s) maximum

ANEC, the European consumer voice in standardisation

*Organisation size
- ○ Micro (1 to 9 employees)

2

- ○ Small (10 to 49 employees)
- ○ Medium (50 to 249 employees)
- ● Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

> 507800799-30

*Country of origin

Please add your country of origin, or that of your organisation.

○ Afghanistan	○ Djibouti	○ Libya	○ Saint Pierre and Miquelon
○ Åland Islands	○ Dominica	○ Liechtenstein	○ Saint Vincent and the Grenadines
○ Albania	○ Dominican Republic	○ Lithuania	○ Samoa
○ Algeria	○ Ecuador	○ Luxembourg	○ San Marino
○ American Samoa	○ Egypt	○ Macau	○ São Tomé and Príncipe
○ Andorra	○ El Salvador	○ Madagascar	○ Saudi Arabia
○ Angola	○ Equatorial Guinea	○ Malawi	○ Senegal
○ Anguilla	○ Eritrea	○ Malaysia	○ Serbia
○ Antarctica	○ Estonia	○ Maldives	○ Seychelles
○ Antigua and Barbuda	○ Ethiopia	○ Mali	○ Sierra Leone
○ Argentina	○ Falkland Islands	○ Malta	○ Singapore
○ Armenia	○ Faroe Islands	○ Marshall Islands	○ Sint Maarten
○ Aruba	○ Fiji	○ Martinique	○ Slovakia
○ Australia	○ Finland	○ Mauritania	○ Slovenia
○ Austria	○ Former Yugoslav Republic of Macedonia	○ Mauritius	○ Solomon Islands
○ Azerbaijan	○ France	○ Mayotte	○ Somalia
○ Bahamas	○ French Guiana	○ Mexico	○ South Africa
○ Bahrain	○ French Polynesia	○ Micronesia	○ South Georgia and the South Sandwich Islands
○ Bangladesh	○ French Southern and Antarctic Lands	○ Moldova	○ South Korea
○ Barbados	○ Gabon	○ Monaco	○ South Sudan
○ Belarus	○ Georgia	○ Mongolia	○ Spain
● Belgium	○ Germany	○ Montenegro	○ Sri Lanka
○ Belize	○ Ghana	○ Montserrat	○ Sudan
○ Benin	○ Gibraltar	○ Morocco	○ Suriname
○ Bermuda	○ Greece	○ Mozambique	○ Svalbard and Jan Mayen
○ Bhutan	○ Greenland	○ Myanmar/Burma	○ Swaziland

- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czech Republic
- Democratic Republic of the Congo

- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho

- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- North Korea
- Northern Mariana Islands
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia

- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

○ Denmark   ○ Liberia   ○ Saint Martin

* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

○ **Anonymous**

Only your type, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

◉ **Public**

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

☑ ***** I agree with the [personal data protection provisions](#)

1. EU product policies

The EU has rules and policies to address products on the EU common market. They generally aim to ensure consumers can safely use or consume products, or to make products more sustainable. In this survey, 'sustainable' means products made in a way that limits negative effects on the environment and climate and ensures resources for products do not run out. Setting EU rules also allows for fair competition because they set the same requirements for all products on the EU market (level playing field).

1.1. To what extent do you agree with the following statements?

	Strongly agree	Agree	No opinion/ don't know	Disagree	Strongly disagree
The EU should set rules for products on the EU market to limit their impact on the environment	◉	○	○	○	○
The EU should set rules to make sure products have a long lifetime.	◉	○	○	○	○
The EU should promote products with reduced environmental impact, for example through labels	◉	○	○	○	○
The EU should set rules and rights to help consumers to engage in the circular economy (e.g. additional consumer rights to repair)	◉	○	○	○	○
Rules for these issues would be better set by the Member States than at EU level	○	○	○	◉	○

Please explain your answers in this section and/or add any views on EU product policies in general

200 character(s) maximum

> EU Ecodesign, energy label and Ecolabel policies are precious tools in EU environmental product policy. Besides energy efficiency, resource efficiency, waste and hazardous chemicals need to be tackled

1.2 When setting rules and policies aimed at reducing the negative environmental effects of products, which types of products should the EU give priority to?

- ○ The EU should aim to reduce effects on the environment of all products
- ● The EU should prioritise the products with the highest impact on climate, the environment or use of resources
- ○ The EU should prioritise those products where significant improvements can be made at lowest cost to producers and consumers
- ○ The EU should prioritise products produced on a large scale for the European market
- ○ The EU should not be setting such rules and policies for products
- ○ Other

1.3 Policies in different phases of the product life cycle

The rules and policies the EU has in place for products are aimed to influence products in different phases of the product life cycle: from design and production to the waste / end-of-life phase. Which of the following approaches do you consider an effective way to achieve the goals as described at the beginning of this section?

	Very effective	Somewhat effective	No opinion/ Don't know	Not very effective	Not at all effective
Design/production phase Setting minimum performance standards (for instance in terms of use of energy and other resources for products on the market *e.g. through the EU Ecodesign directive)*	◉	○	○	○	○
Restricting the use of certain hazardous substances or chemicals *(e.g. the Directive on the Restrictions of Hazardous Substances in electrical and electronic equipment (RoHS) and the Registration, evaluation and authorisation of chemicals (REACH) regulation)*	◉	○	○	○	○
Setting safety standards and product certifications *(through CEN/CENELEC standards)*	○	◉	○	○	○
Making producers pay for the waste their products will cause *(e.g. Extended Producer Responsibility schemes)*	○	◉	○	○	○
Consumption/procurement phase Public authorities giving priority to environmentally friendly products when buying products *(Green public procurement)*	◉	○	○	○	○
Ensuring consumers have information on the impacts of products, so they can choose the best environmentally-performing products *(e.g. Energy labelling, EU Ecolabel)*	◉	○	○	○	○
Verification of the performance of new technologies and materials *(Environmental Technology Verification)*	○	○	◉	○	○
Supporting longer product lifetimes through extended product warranties /commercial guarantees for products	◉	○	○	○	○
Supporting longer product lifetimes through better and cheaper repair options	◉	○	○	○	○

Encouraging sharing and reuse of products so they are used more intensely and effectively	○	◉	○	○	○
Providing consumers information on the durability and reparability of products	◉	○	○	○	○
Waste/end-of-life phase Setting requirements and targets for the correct handling of waste *(Waste legislation)*	◉	○	○	○	○
Specifically targeting certain waste streams with high impact *(e.g. in the directives on Waste from Electrical and Electronic Equipment (WEEE), and on End-of-Life Vehicles (ELV))*	○	○	◉	○	○

If you wish to add any comments on your answers or on policies in the different phases of the product life cycle, you may do so here.

200 character(s) maximum

> Also on answer to 1.2 on priority setting:Only so can measures be meaningful and meet the ultimate goal of resource efficiency or of a "resource saving economy" as we state in https://bit.ly/2TNa1kv

1.4 Electrical and Electronic Equipment (EEE)

The EU has legislation and other policy instruments for electrical and electronic equipment, such as TVs, washing machines, fridges, vacuum cleaners and computers.

a. How familiar are you with the EU rules and policies for this sector?
- ● Very familiar
- ○ Quite familiar
- ○ Somewhat familiar
- ○ Not very familiar
- ○ Not at all familiar

b. Do you think the sustainable design and production of these products are adequately covered by EU policy instruments (such as the EU Ecodesign Directive and the Directive on restriction of hazardous substances in EEE)?
- ○ Adequately covered
- ● Inadequately covered
- ○ Not covered at all
- ○ Don't know

c. Do you think there are sufficient EU policy instruments providing consumers with information on sustainability for these products (such as the EU Energy label and the EU Ecolabel)?
- ● Sufficient
- ○ Insufficient
- ○ Not covered at all
- ○ Don't know

d. Do you think there are sufficient EU policy instruments covering the end-of-life / waste handling of these products? (such as the directive on Waste from Electrical and Electronic Equipment)
- ● Sufficient
- ○ Insufficient
- ○ Not covered at all
- ○ Don't know

e. What do you usually do with old appliances you no longer need?
- ○ Try to sell to second-hand store or online
- ○ Return to a store selling similar appliances
- ○ Bring to waste sorting centre / recycling centre

○ Give away to friends or a charity

○ Discard with the municipal waste

◉ Other

Please briefly explain your answers to these questions and add any further comments

200 character(s) maximum

> all of the above will apply to different consumer groups and depending on the availability of the options.

1.5 Furniture

The EU has legislation and other policy instruments for furniture, for example on chemicals that are allowed to be used (REACH).

a. How familiar are you with the EU rules and policies for this sector?

○ Very familiar

○ Quite familiar

◉ Somewhat familiar

○ Not very familiar

○ Not at all familiar

b. Do you think the sustainable design and production of these products are adequately covered by EU policy instruments?

○ Adequately covered

◉ Inadequately covered

○ Not covered at all

○ Don't know

c. Do you think there are sufficient EU policy instruments providing consumers with information on sustainability for these products (such as the EU Ecolabel)?

○ Sufficient

○ Insufficient

○ Not covered at all

◉ Don't know

d. Do you think there are sufficient EU policy instruments covering the end-of-life / waste handling of these products? (such as the waste framework directive)

○ Sufficient

◉ Insufficient

○ Not covered at all

○ Don't know

e. Do you regularly purchase second-hand furniture?

○ Yes, I prefer second-hand furniture (if still in good shape) because it has proven to be durable

○ Yes, if the price is significantly lower than for new furniture

○ No, I prefer new furniture

◉ No opinion / Don't know

Please briefly explain your answers to these questions and add any further comments

200 character(s) maximum

> these questions are addressed to individuals, all of the above will apply to different consumer groups and depending on the availability of the options

1.6 Textiles (clothing, footware, carpets, etc)

The EU has legislation and other policy instruments for textiles, for example on chemicals that are allowed to be used (REACH) and on labelling of textiles (textiles regulation).

a. How familiar are you with the EU rules and policies for this sector?

◉ Very familiar

○ Quite familiar

○ Somewhat familiar

○ Not very familiar

○ Not at all familiar

b. Do you think the sustainable design and production of these products are adequately covered by EU policy instruments?

○ Adequately covered

◉ Inadequately covered

○ Not covered at all

○ Don't know

c. Do you think there are sufficient EU policy instruments providing consumers with information on sustainability for these products (such as the EU Ecolabel)?

◉ Sufficient

○ Insufficient

○ Not covered at all

○ Don't know

d. Do you think there are sufficient EU policy instruments covering the end-of-life / waste handling of these products? (such as the Waste Framework Directive)

○ Sufficient

◉ Insufficient

○ Not covered at all

○ Don't know

e. Would you be willing to pay a somewhat higher price for clothes, carpets or shoes if you were convinced they were more sustainable?

- ☐ Yes, if they are better for the environment
- ☐ Yes, if there are guarantees they were produced under good working conditions
- ☐ Yes, if they will have a longer lifetime
- ☐ No, I choose my clothes based on other reasons, such as fashion and price

Please briefly explain your answers to these questions and add any further comments

200 character(s) maximum

1.7 Toys

The EU has legislation and other policy instruments for toys. The toys regulation covers toy safety, while the materials that can be used are regulated by instruments such as the REACH Regulation.

a. How familiar are you with the EU rules and policies for this sector?
- ● Very familiar
- ○ Quite familiar
- ○ Somewhat familiar
- ○ Not very familiar
- ○ Not at all familiar

b. Do you think the sustainable design and production of these products are adequately covered by EU policy instruments?
- ○ Adequately covered
- ● Inadequately covered
- ○ Not covered at all
- ○ Don't know

c. Do you think there are sufficient EU policy instruments providing consumers with information on sustainability for these products?
- ● Sufficient
- ○ Insufficient
- ○ Not covered at all
- ○ Don't know

d. Do you think there are sufficient EU policy instruments covering the end-of-life / waste handling of these products? (such as the waste framework directive)
- ● Sufficient
- ○ Insufficient
- ○ Not covered at all
- ○ Don't know

e. When purchasing toys, is their environmental impact a big factor in your choices?
- ○ No, price and safety are my only considerations
- ○ Price and safety are the most important, but I also consider environment

○ Yes, environment is as important as safety and price

Please briefly explain your answers to these questions and add any further comments

200 character(s) maximum

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2 Public expectations and trust in information on products

Products generally come with a label or manual that contains information on the ingredients or components of the product. In some cases further information is provided, for example on environmental impacts. The EU influences requirements for this information through various rules and other policy tools. Please answer the following questions, keeping in mind we are referring to a wide range of products, (food and drinks, electric devices, textiles, furniture, etc).

2.1 To what extent do you agree with the following statements?

	Strongly agree	Agree	No opinion/ don't know	Disagree	Strongly disagree
I prefer buying products with labels stating that they perform well in terms of their impact on the environment	○	○	●	○	○
Price is the only aspect that I look at when buying products	○	○	●	○	○
I generally rely on brand reputation as regards quality and technical performance	○	○	●	○	○
I do not trust information on labels	○	○	●	○	○
There are too many different and confusing labels around that provide environmental information	○	●	○	○	○
I do not trust information provided by producers themselves	○	○	●	○	○
I would be willing to pay more for a product if I could be sure it is more sustainable	○	○	●	○	○
I often look for information on quality, durability or sustainability of products in specialised magazines or on Internet	○	○	●	○	○
Claims on sustainability made on product labels should be verified by a public EU body	○	●	○	○	○

Environmental information and functional performance should be verified by an independent 3rd party	○	●	○	○	○
I have the impression producers purposely make products that do not last long	○	○	●	○	○
I would prefer to buy products that can easily be repaired	○	●	○	○	○

2.2 How important is it to you that the following information is made available on products?

	Very important	Quite important	No opinion / don't know	Not very important	Not at all important
Ingredients/components	○	●	○	○	○
Place of manufacturing of product and/or components	○	○	○	●	○
Production type (organic, covered by an environmental management system, etc.)	●	○	○	○	○
Information on a single specific environmental issue (e.g. climate change)	○	○	●	○	○
Information on environmental impacts of the product during its whole life cycle (use of resources, manufacturing, transport, use, waste or recycling, etc.)	○	●	○	○	○
Information pointing to environmentally excellent products, so as to choose the best products (e.g. through ecolabels such as the EU Ecolabel)	●	○	○	○	○
Information on the environmental performance of the specific product in comparison to the average performance of the product on the EU market (e.g. better, average, worse)	○	○	○	●	○
Information on the technical performance of the product, especially for innovative or technology products	○	●	○	○	○
Information on life expectancy of a product	●	○	○	○	○
Information on how easily a product could be repaired when broken	●	○	○	○	○
Information about how and where the product and its components can be recycled	●	○	○	○	○

2.3 Familiarity and trust in labels

Please answer a few short questions regarding the labels described below.

The EU Ecolabel

Are you familiar with the EU Ecolabel?

- ⦿ Yes, very familiar
- ○ Yes, somewhat familiar
- ○ Not very familiar but it rings a bell
- ○ Not at all familiar

Would you prefer a product with this label on it (with a good score) over one without (or a bad score)?

- ⦿ Yes, strong preference
- ○ Maybe, if I was undecided it could make the difference
- ○ No, it plays no role in my decision

Do you know which aspects are covered by this label?

- ○ No, I don't know
- ○ I don't know precisely which aspects are covered but know where to find this information
- ○ I have a general idea of the elements covered
- ○ I know the aspect I consider most important is covered (e.g. impact on climate)
- ⦿ I know what aspects are covered

Other Ecolabels

Are you familiar with such labels?

- ⦿ Yes, very familiar
- ○ Yes, somewhat familiar
- ○ Not very familiar but it rings a bell
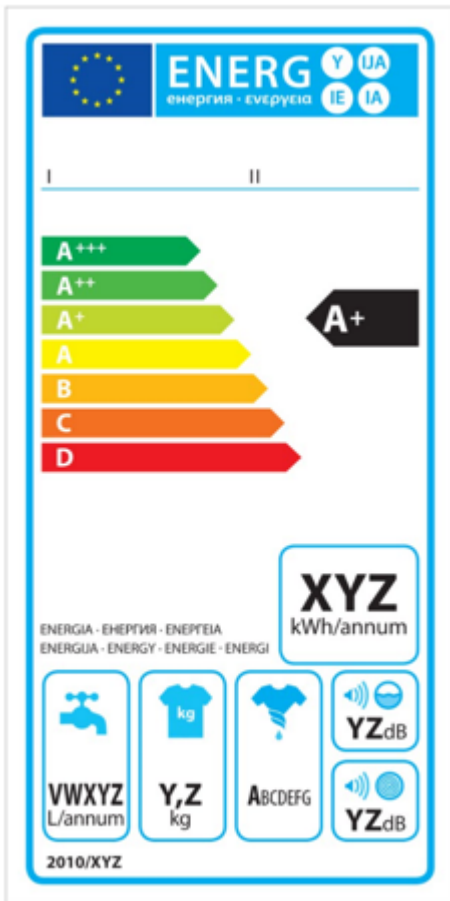- ○ Not at all familiar

Would you prefer a product with such a label on it (with a good score) over one without (or a bad score)?

- ⦿ Yes, strong preference
- ○ Maybe, if I was undecided it could make the difference
- ○ No, it plays no role in my decision

Do you know which aspects are covered by this label?

- ○ No, I don't know
- ○ I don't know precisely which aspects are covered but know where to find this information
- ○ I have a general idea of the elements covered
- ○ I know the aspect I consider most important is covered (e.g. impact on climate)
- ⦿ I know what aspects are covered

EU Energy Label

Are you familiar with the EU Energy label?

- ● Yes, very familiar
- ○ Yes, somewhat familiar
- ○ Not very familiar but it rings a bell
- ○ Not at all familiar

Would you prefer a product with this label on it (with a good score) over one without (or a bad score)?

- ● Yes, strong preference
- ○ Maybe, if I was undecided it could make the difference
- ○ No, it plays no role in my decision

Do you know which aspects are covered by this label?

- ○ No, I don't know
- ○ I don't know precisely which aspects are covered but know where to find this information
- ○ I have a general idea of the elements covered
- ○ I know the aspect I consider most important is covered (e.g. impact on climate)
- ● I know what aspects are covered

Labels for specific materials, such as wood, palm oil or fish

Are you familiar with such labels?

- ○ Yes, very familiar
- ● Yes, somewhat familiar
- ○ Not very familiar but it rings a bell
- ○ Not at all familiar

Would you prefer a product with such a label on it (with a good score) over one without (or a bad score)?

- ○ Yes, strong preference
- ● Maybe, if I was undecided it could make the difference
- ○ No, it plays no role in my decision

Do you know which aspects are covered by this label?

- ○ No, I don't know
- ○ I don't know precisely which aspects are covered but know where to find this information
- ● I have a general idea of the elements covered
- ○ I know the aspect I consider most important is covered (e.g. impact on climate)
- ○ I know what aspects are covered

EU organic farming

Are you familiar with the EU organic farming label?

- ● Yes, very familiar
- ○ Yes, somewhat familiar

- ◉ Not very familiar but it rings a bell
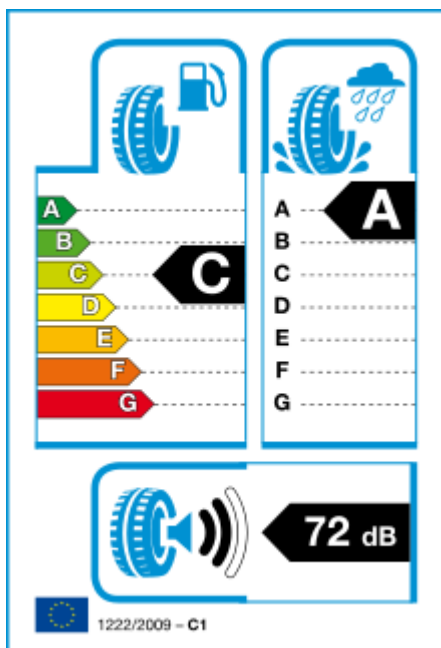- ◉ Not at all familiar

Would you prefer a product with this label on it (with a good score) over one without (or a bad score)?
- ◉ Yes, strong preference
- ◉ Maybe, if I was undecided it could make the difference
- ◉ No, it plays no role in my decision

Do you know which aspects are covered by this label?
- ◉ No, I don't know
- ◉ I don't know precisely which aspects are covered but know where to find this information
- ◉ I have a general idea of the elements covered
- ◉ I know the aspect I consider most important is covered (e.g. impact on climate)
- ◉ I know what aspects are covered

EU tyre label

Are you familiar with the EU tyre label?
- ◉ Yes, very familiar
- ◉ Yes, somewhat familiar
- ◉ Not very familiar but it rings a bell
- ◉ Not at all familiar

Would you prefer a product with this label on it (with a good score) over one without (or a bad score)?
- ◉ Yes, strong preference
- ◉ Maybe, if I was undecided it could make the difference
- ◉ No, it plays no role in my decision

Do you know which aspects are covered by this label?

- ⚪ No, I don't know
- ⚪ I don't know precisely which aspects are covered but know where to find this information
- ⚪ I have a general idea of the elements covered
- ⚪ I know the aspect I consider most important is covered (e.g. impact on climate)
- 🔘 I know what aspects are covered

If you want to, you may give any comments or further reflections on the different labels here

200 character(s) maximum

[text box]

2.4 As a consumer, are you satisfied with the environmental information available on products?

- ⚪ Yes
- ⚪ Partially
- 🔘 No
- ⚪ No opinion

If you replied "partially" or "no", please explain what in your view is missing

more products and aspects should be covered by Ecodesign and other existing EU environmental product policies

2.5 Would you like to have more environmental information beyond what is displayed on the product itself (e.g. online)?

- ⚪ Yes
- ⚪ Only if it is easily accessible and understandable
- 🔘 Only if it is provided by organisations independent from the producer (e.g. public databases, consumer organisations, etc.)
- ⚪ No
- ⚪ No opinion

2.6 Did you ever encounter a label or environmental information that you would qualify as misleading?

- 🔘 Yes
- ⚪ No

2.7 If yes, did you file a complaint?

- ⚪ Yes
- ⚪ No, I would have liked to but don't know how to do this
- 🔘 No for other reasons

2.8 Please explain your experience with this false claim briefly

200 character(s) maximum

> examples of misleading green claims can be given in several sectors, household, detergents, cars, work by DG JUST on guidance in the UCP directive and court cases by consumer organisations show.

3. The EU Ecolabel

The EU Ecolabel can be displayed on products if they meet certain criteria set at EU level, so that consumers know the products live up to the highest environmental standards.

Would you be willing to answer a few questions on the EU Ecolabel?

- ◯ Yes
- ◉ No

4. Opinions on the Environmental Footprint methods and their policy applications

Between 2013 and 2018, the Commission ran a pilot phase for applying methods to measure the environmental impact (or footprint), of products and organisations. These are called the Product Environmental Footprint (PEF) and Organisation Environmental Footprint (OEF) methods. 27 different industry sectors (covering more than 60% of the EU market on a consumption basis), Member States, and some NGOs took part on a voluntary basis. They tested how to develop product and sector specific harmonised calculation rules, how to verify the information and how to communicate it to consumers, businesses and other stakeholders. After the conclusion of the pilot phase, the Commission is considering the next steps. Some of the questions below might be difficult to answer without any knowledge of the Environmental Footprint methods or pilot phase.

The European Commission is running targeted consultations on the potential future use of the Environmental Footprint methods. They are targeted to businesses and business associations, investors, NGOs, public administrations and method/ initiative owners.

4.1 Would you be willing to answer a few questions relating to the Environmental Footprint methods?

- ◉ Yes
- ◯ No

4.2 Please select the statement(s) that applies to you

- ☐ I know about Life Cycle Assessment
- ☐ I am aware of the EU Environmental Footprint pilot phase, but was not involved
- ☑ I (or my organisation) followed the EU Environmental Footprint pilot phase as a stakeholder
- ☐ I (or my organisation) was member of one of the Technical Secretariats developing Product Environmental Footprint Category Rules or Organisation Environmental Footprint Sector Rules during the EU Environmental Footprint Pilot phase
- ☐ I am not aware of this work.

4.3 What should the Commission do now with the new harmonised PEF and OEF methods and the 22 category/sectoral rules developed during the pilot phase?

	Strongly agree	Moderately agree	Don't know / no opinion	Moderately disagree	Strongly disagree
Stop the work and leave the eventual implementation of the methods to stakeholders	◉	○	○	○	○
Continue supporting the development of product/sector rules on a voluntary basis but without any direct application in existing or new policies	○	○	○	◉	○
Delegate the management of a voluntary Product Environmental Footprint (PEF) scheme to a 3rd party	○	○	○	○	◉
Delegate the management of a voluntary Organisation Environmental Footprint (OEF) scheme to a 3rd party	○	○	○	○	◉
Use the PEF/OEF methods and product/sector specific rules as common knowledge basis in existing or new policies (e.g. to support the development of EU Ecolabel criteria, Green Public Procurement criteria, Sustainable Finance, Eco-management and Audit scheme, etc)	○	○	○	○	◉
Review existing policies related to the environmental performance of products and/or organisations making them compliant with the PEF /OEF methods	○	○	○	○	◉
Develop new policies related to the environmental performance of products and/or organisations compliant with the PEF/OEF methods (e.g. on misleading green claims and proliferation of environmental labels)	○	○	○	○	◉
Create an EU repository of PEF results for products	○	○	○	○	◉

Create an EU rating scheme based on OEF results for companies and organisations	○	○	○	○	◉
Provide requirements on how to communicate to consumers, businesses and other stakeholders (e.g. NGOs) on the Environmental Footprint	○	○	○	○	◉

4.4 Who should take the responsibility of making available reliable environmental information on products and organisations?

	Strongly agree	Moderately agree	Don't know / no opinion	Moderately disagree	Strongly disagree
European Union	○	○	○	○	◉
Member States (countries)	○	○	○	○	◉
NGOs	○	○	○	○	◉
Companies (including their associations)	○	○	○	○	◉
Others	○	○	○	○	○

If others, please specify:

4.5 How important do you rate the following elements for providing reliable, comparable and comprehensive environmental information?

	Very important	Quite important	Don't know / no opinion	Not very important	Not at all important
Product group and sector-specific calculation rules (e.g. how to calculate the environmental performance of clothing)	○	○	○	○	◉
Availability of a benchmark (performance of the average product) per product group which allows to determine if a specific product is performing better or worse than this average	○	○	○	○	◉

Availability of a metric that allows to compare companies' environmental performance within a sector	○	○	○	○	◉
Clear rules on how to develop product group and sector-specific calculation rules	○	○	○	○	◉
Requiring the gathering of primary (company-specific) data for specifically defined processes that are most relevant from an environmental point of view and where primary data can be accessed	○	○	○	○	◉
Availability of common, free average (secondary) data	○	○	○	○	◉
Calculation tools enabling non-experts to carry out the analysis	○	○	○	○	◉
Use of a solid verification system	○	○	○	○	◉

4.6 Who should develop EU-wide product group and sector-specific rules?

	Best	Good	No opinion / don't know	Less appropriate	Worst
The private sector, with input from other stakeholders (e.g. NGOs, academia, public administrations, etc)	○	○	○	○	○
The private sector, supervised by the European Commission and with input from other stakeholders (e.g. NGOs, academia, public administrations, etc)	○	○	○	○	○
Standardisation organisations (e.g. European Committee for Standardisation), based on EU rules	○	○	○	○	○
The European Commission, with input from the private sector and other stakeholders (e.g. NGOs, academia, etc)	○	○	○	○	○
Other	◉	○	○	○	○

Please specify 'other'

nobody, in our view they shouldn't be developed.

4.7 Do you think that the European Commission should focus on specific strategic sectors when developing product- or sector-specific calculation rules?

○ Yes, based on potential environmental impact

○ Yes, based on importance for the EU economy

○ Yes, based on importance for capital markets (e.g. market capitalisation of a sector) and/or financial stability

○ Yes, based on a combination of factors (e.g. environmental impact and importance for the EU economy)

○ No, the decision should be left to industry

● No need to develop product- or sector-specific calculation rules

○ I don't know/ no opinion

Please specify any strategic sector you think the European Commission should focus on:

>

4.8 What communication requirements related to environmental information would be most effective in your opinion for products and organisations?

	Very Effective	Effective	Don't know / no opinion	Not very effective	Not effective at all
Defining and monitoring compliance with the following communication principles: transparency, availability & accessibility, reliability, completeness, comparability and clarity	○	○	●	○	○
Fines for breaching any of the communication principles.	○	○	●	○	○
Prescribe minimum information content, without prescribing the format	○	○	●	○	○
Prescribe minimum information content and a format for communicating to consumers, and one for communicating with business partners(to use e.g. on a label, on-shelf information, online, on product declarations, in reporting etc.)	○	○	●	○	○
Encourage to transfer PEF information along the supply chain through barcodes	○	○	●	○	○
Mandatory verification (communicating information is voluntary, verification is mandatory)	○	○	●	○	○
Other	○	○	○	○	○

If other, please specify

4.9 Where should Environmental Footprint information on products be made available? (you can choose more than one)

- ☐ Directly on the product (e.g. on the label)
- ☐ Near the product (e.g. on the shelf or in an leaflet provided with the product
- ☐ Online (e.g. linked to the the product through a QR or barcode)
- ☑ other
- ☐ don't know / no opinion

please specify 'other'

> Nowhere.
> Due to the methodological constraints of the LCA approach, Environmental Footprint cannot provide sound information to help consumers in choosing an environmentally friendly product. Among the limitations of the LCA Approach are: lack of precision, limited comparability, difficulty to identify superior products or omission of relevant environmental aspects. Please find more info in ANEC paper: https://bit.ly/2R4npip

4.10 Please provide any further comments, explanations or suggestions relating to Environmental Footprint methods (for example other measures to improve the availability and comparability of environmental information).

200 character(s) maximum

5 Closing

5.1 Do you have any further comments or suggestions on how the EU should address sustainability of products?

400 character(s) maximum

> Dismiss the Environmental Footprint project and start from scratch an open debate on the appropriate mix of instruments required for different purposes in the field of environmental performance assessment, addressing strengths and weaknesses of current methods as well as different needs of different stakeholders.

5.2 If you would like to, you may upload your position paper or other relevant document here.

The maximum file size is 1 MB

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

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