



Antonio Tajani

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Janez Potočnik

European Commissioner for Environment
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With copy to:

Michel Barnier

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Address for replies :

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Dear Vice-President Tajani, Dear Commissioner Potočnik,

Single Market for Green Products - Product/Organisation Environment Footprint methodologies

We, the undersigned European industry associations, write to you to convey some comments on the work undertaken by DG Environment and the Joint Research Centre (JRC) on the EU Product and Organisation Environmental Footprint harmonised methodologies (PEF/OEF). Several of our member companies have helped with the preparatory work on PEF/OEF and have participated in similar or related initiatives (PAS 2050, French Grenelle, Food SCP Round Table draft ENVIFOOD protocol). Some of these have already gathered specific findings and made recommendations.

You will recall that we wrote to you previously, on 13 September 2010, acknowledging the need to encourage consumers to move towards sustainable consumption patterns. We also drew your attention to the leading role of industry in driving this change, as well as our work on sustainable production and design. At the same time, however, we also highlighted our concerns over the numerous national initiatives which were springing up in Member States. In particular, we expressed our concerns over:

- **The potential implications for the proper functioning of the Single Market**

We feared that Member State initiatives on environmental information would run contrary to Single Market principles, confusing consumers and increasing costs for industry. Our wish at that time was to work towards a harmonized approach at European and international levels on key aspects of environmental communication.

- **The lack of harmonisation in methodologies in the promotion of sustainable products**

We called for a pan-European approach, built around EU-wide science-based assessments. The approach should be based on Life Cycle Analysis (LCA), addressing sectoral approaches, prioritizing products, and including provision for self-regulation by industry.

- **The presumption of a focus on carbon labelling in environmental information.**

We supported the use of an LCA-based approach to analyse the main environmental hotspots in product categories, but it seemed wrong to presume in advance of such LCA analysis that carbon labelling should be preferred over other indicators.

We consider all three statements as still valid today.

We welcome the progress made so far by DG Environment and the JRC on the PEF/OEF methodologies. Given the planned European Commission Communication entitled “Building the Single Market for Green Products”, our industry associations would like to share the following further comments:

- **We believe it is vital to run the pilot of the proposed EU PEF/OEF methodologies before wider application:**

For a new process which may be fundamental to the functioning of competitive markets, it is essential that adequate pilot testing be done in relevant sectors and the feedback taken into account before any general application through regulatory instruments or non-voluntary approaches. Such advance testing must be thoroughly performed to the satisfaction of all stakeholders. Also, any learning from other similar experimentation initiatives should be taken into account, for example the French environmental information experimentation¹ and the on-going sectoral ENVIFOOD Protocol pilot tests under the Food SCP RT ; both highlight the very resource intensive nature of the LCA/data gathering exercise and the need to support companies, and SMEs in particular, in such exercises.

- **Providing relevant information to consumers:**

Consumer information must make sense for consumers and be effective in guiding them towards better environmental choices, and ultimately, towards better sustainable consumption and use patterns, according to the nature of each product sector. In its report, “Communicating environmental performance along the food chain”², the Food SCP RT concluded that companies and/or brands should consider a mix of communication devices and not rely on a single or limited set of communication tools. It is important to note that for many products, it is the use phase where the biggest sustainability savings can be made, rather than the characteristics of the product per se.

¹ Available at http://www.developpement-durable.gouv.fr/IMG/pdf/synthese_rapport_E_Y_V2.pdf

² Available at http://www.food-scp.eu/files/ReportEnvComm_8Dec2011.pdf

- **Securing the competitiveness of the EU industry and applying this thinking at global level:**

The EU industry should not be placed at a competitive disadvantage. It is vital to make sure that in these approaches and discussions, the search for a harmonized methodology is pursued not only at national and regional (EU) level but, more importantly, at global level, to ensure a common level playing field for all. The EU should continue to work closely with, for example, UNEP so that such measures ultimately apply to all regions of the world.

In our view, we need to work towards the following aims and objectives:

- Securing a Single Market approach on sustainability and environmental information/claims by creating a level playing field for all companies within a sector
- Focusing on the major environmental hot spots as determined by LCA in each product sector
- Providing relevant, useful end-user information
- Delivering the above whilst not being too intensive in terms of human and financial resources
- Driving continuous improvement in product design
- Stimulating industry to deliver rather than overburdening existing resources
- Promoting voluntary sectoral approaches that can deliver the EU's policy objectives more quickly and cost-effectively than regulation
- Securing international engagement on the topic to avoid undermining EU industry competitiveness

We look forward to continuing our engagement with you as constructive partners in contributing to these efforts. We remain committed to addressing the sustainability agenda in adequate, relevant and resource efficient ways, ultimately valuable for consumers.

Yours sincerely,



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Alain Galaski, Director General, AIM - European Brands Association

Jan Van der Meulen, Director General, CEPE - The European Council of Producers and Importers of Paints, Printing Inks and Artists Colours

Bertil Heerink, Director General, Cosmetics Europe – The Personal Care Association

Pierre Wiertz, Director General, EDANA – The International Association serving the nonwovens and related industries

Alain D'Haese, Director General, FEA – The European Aerosol Federation

Bernard Ghyoot, Director General, FEICA- The Association of the European Adhesive & Sealant Industry

Tove Larsson, Director Environmental Affairs, Food Drink Europe- The European food and drink industry