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Position paper on the Eco-label Regulation

The European Union Eco-label Regulation has been in place since 1992. Several EU impact assessments have shown that the scheme is not achieving its objectives due to low awareness and low uptake by industry resulting from overly bureaucratic processes. The EU Commission has therefore issued a proposal for a revision which aims to fit better with other sustainable production and consumption actions, opens the scope of the label to more product groups with quicker criteria development and introduces measures to harmonise the EU label with other existing eco-labelling schemes.

AmCham EU members welcome the revision and simplification of this regulation as a better fit with other sustainable production and consumption actions. Members believe that eco-labelling can be of value to consumers if labelling supports decisions based on science and life cycle analysis. Therefore, AmCham EU would like to draw attention to the following points in the revised eco-labelling scheme.

- The scheme should continue to remain voluntary.¹
- All standards should use agreed upon life cycle analysis that is based on sound science. The standards, by which products are evaluated, should hold the following as key components:
 - Be transparent and promote dialogue between all interested parties
 - Be agreed upon by consensus and open for consultation
 - Cover the life cycle of the product from extraction of raw materials, progress through production, distribution, use phases, recycling and the end disposal after use
 - Have a third party independent administrator and third party accreditation
 - Whilst overarching standards may be desirable, specific standards should apply to specific products and product group families – all standards must be performance based
 - Avoid conflicting instruments i.e.interference with existing legislation and existing performance assessment schemes that already exist in the building sector
 - It is important to ensure the compatibility of the Eco-label regulation with already existing standards such as ISO 14040 is for the introduction, principles and framework and ISO 14044 for more specific guidelines and requirements.

If these components are applied, eco-labelling can provide several benefits to industry, consumers and governments but can also be misleading if used inappropriately. It is therefore very important that the eco-label regulation must support the following points if it is to be valued by the consumers:

- The analysis of the product must be credible and based on standards consistent with the components listed above

¹ EVER Study: http://ec.europa.eu/environment/ecolabel/revision_en.htm

- The products must meet these agreed upon criteria and not be reliant upon unsubstantiated claims by the producer.
- An independent third party must be involved to lend credibility to the eco-label.

Under these circumstances, the eco-label can become an important element in the mix of SPC policy instruments with a higher appeal for uptake by industry.

European Union Eco-labelling Board (EUEB). In order to ensure the proper revision and implementation of the standards and criteria as well as the simplified administration of the implementation of the Eco-label, the EUEB is instated. AmCham EU welcomes this board as a third party policy instrument to ensure balanced participation by all stakeholders in the value chain including manufacturers and retailers and is committed to engage actively in its work.

Scope of the Label – AmCham EU believes that the food chain should be out of scope of the eco-label. The current European Commission proposal suggests labelling on only a small part of the chain i.e. processed foods which does not fit with the principles of life cycle analysis. Since clarity on how to label food is missing, AmCham EU thinks that it is really premature to talk about eco-labels for food

Harmonisation with other Eco-labelling schemes

Eco-labels have been in place in the EU since 1977 when the Blue Angel in Germany was introduced. Since that time, multiple other countries have been operating their own schemes and defined programs. As multinational corporations operating globally, AmCham EU members believe that it is in the best interest of the single market if there is policy coherence. There should be no overlap with other Community legislation or other Member State legislation and labels should be harmonised as far as possible, not only within the EU but also globally.

Trade Barriers: The revision of the eco-labelling scheme should not raise any barriers to trade.

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