

March 16<sup>th</sup> 2009

## **Position paper on the Retailer Forum**

As part of the SCP Action Plan, the Commission has proposed establishing a Retailer Forum to reduce the environmental footprint of the retail sector and its supply chains. As a result this Forum would promote more sustainable products and better information for consumers which could influence their purchasing behaviour. The proposal for a Retailer Forum is the result of policy makers recognising the interface between the retailer and the consumer is potentially the most effective point of leverage when seeking to effect changes in consumption patterns.

The Retailer Forum as currently envisaged would be based on bilateral agreements between the Commission and the retail sector. This would risk disenfranchising suppliers and manufacturers. AmCham EU believes that more sustainable consumption necessitates a transformation of the entire supply chain which could be possible through partnership of retailers and other stakeholders. As such the Retailer Forum should be extended to include the entire supply chain and ensure an active voice and equal role for suppliers and manufacturers.

The likely focus of the Forum would be on the use of existing or proposed tools such as eco-labels as criteria to facilitate product/supplier selection. AmCham EU believes “choice-editing” by retailers based on eco-labels could erode the voluntary basis of the eco-label scheme. In addition, current EU eco-label criteria for certain products are potentially outmoded and can suffer from a misplaced emphasis on aspects that are not necessarily the most significant when taking into account the whole life cycle of the product.

“Choice-editing” based on chemical hazards is also a real possibility and would pose numerous challenges. REACH is the only appropriate regulatory instrument for chemical management. AmCham EU believes that any consideration of chemical hazard therefore needs to be consistent with the provisions of REACH. Measures inconsistent with REACH, may *de facto* constitute restrictions on free circulation of chemical products which is contradictory to the internal market aims of REACH.

Retailers (EuroCommerce and the European Retailer Round Table or ERRT) have responded to the European Commission’s proposal, with a proposal for a Retailer Environmental Action Programme (REAP). This programme helps facilitate dialog on such issues as energy and resource saving products, eco-labels, environmental indicators (including carbon), information to consumers, energy consumption in stores, efficient logistics, efficient refrigeration, waste management and green private purchasing. Many, if not all, of these will have implications that extend up the supply chain.

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