

A.I.S.E. POSITION PAPER**A.I.S.E. Position on Carbon footprinting and labelling**

The Soaps, Detergents and Maintenance products industry in Europe has been particularly proactive with voluntary initiatives in aid of sustainable development, with the overall objective of improving sustainable production and consumption of its products.

Whilst all sectors should play their role in reducing carbon emissions, priority should be given to carbon foot-printing and labelling of those products and services which have the biggest impact and therefore, a large potential to reduce greenhouse gas emissions.

In view of the above, the A.I.S.E. position on carbon foot-printing* and labelling* is as follows:

1. Our industry believes that **all societal actors - including our industry - have a role to play** in implementing the overall sustainability agenda, reflecting the UNEP motto: "Every single act counts".
2. Within this overall framework, **we are committed to achieving progress towards a low carbon economy** given that CO₂ emissions are an important factor in the environmental area of sustainability.
3. While carbon is one of the most important parameters, it is also important to continue to address other themes such as resources efficiency, i.e. the efficient use of chemicals, packaging materials and water.
4. We believe in the concept of "shared responsibility" where **manufacturers AND consumers/customers play their role**. In practice, this means manufacturers not only working to improve their own sustainability practices, but also informing end-users about sustainability in the use phase.
5. Concerning the environment, **the use phase** can account for the biggest impact when looking at the "process" of cleaning or washing. It should therefore be part of any carbon footprint methodology. In the context of detergents, between 50 to 80% of life cycle carbon emissions of cleaning products can occur during the use phase of these products (e.g. where this involves water heating for dishwashers or washing machines).
6. It is our opinion that the carbon footprint calculation methodology and supporting data are **not yet sufficiently developed** to allow meaningful carbon labelling of individual products that is accepted by all at the present time.
7. Furthermore the **relevance** of on-pack carbon labels for consumers/ customers has not been proven and labelling should be seen only as **one of a number of ways of communicating** with end-users on climate change. The 'Study for the EU Ecolabel carbon footprint measurement toolkit', produced for the European Commission by 'Life Cycle Engineering' and published on 10 November 2008 backs this opinion (see page 4 of the study: "a figure concerning CO₂ emissions of product life cycle should not be displayed below the flower logo")
8. Specifically for carbon footprint measurement and on-pack carbon labelling, the industry is **looking for a solution which:**
 - Is based on sound-science;
 - Is both meaningful and helpful in achieving carbon reductions;
 - Communicates meaningful differences to the end-user;
 - Reflects the broad consensus of stakeholders and consumers/customers;
 - Forms a meaningful part of an overall sustainability implementation strategy;
 - Is actionable from practical standpoint with a clear benefit/cost ratio;
 - Is preferably based on a harmonised international standard;
 - Respects competition law.

A.I.S.E. is aware that on European and national level several initiatives on the development of carbon footprint calculation methodologies and supporting data have been launched (e.g. European Commission via Life Cycle Engineering, 'The Carbon Trust' in the UK, Product Carbon Footprints (PCF) Pilotprojekt Deutschland in Germany). We also understand that at ISO level, a working draft study is being initiated for a harmonised approach (cf ISO/WD 14067-2 Carbon footprinting of products¹). However, so far none of those calculation methodologies have been sufficiently finalised and, at this stage, are able fulfil the requirements as listed above.

Further assessment are being done at EU level in this domain and A.I.S.E. looks forward to a harmonised approach in this domain building on the work at ISO level.

Note:

- In the field of detergents where the use phase accounts for the biggest impact (see point 4), we strongly recommend that any campaign to **influence consumers/customers should focus primarily on using low energy (dish)washing appliances and programmes**, thus going beyond just the "purchasing decision" of a detergent product.

A.I.S.E. has led several campaigns in this respect since many years; see www.washright.com ; www.saveenergyandwater.com and also www.sustainable-cleaning.com

A.I.S.E. remains available, as well as its National Associations across Europe and company members, to the European Commission and any other interested body to share their views, experiences in the domain of sustainable production and consumption and activities towards a low carbon economy as well as thoughts for the future.

***Glossary:**

- **A Carbon footprint** is a "measure of the total amount of greenhouse gases (GHGs) resulting from the life cycle of a product or service (the "embodied" GHG emissions). It is expressed as CO₂-equivalents. It is useful in allowing individuals and organizations to conceptualize their contribution to global warming. The major contributors to carbon footprints are often related to fossil energy consumption. The full life cycle carbon footprint of a product or service may be calculated using Life Cycle Assessment (LCA) methodology.

- **Carbon labelling** (sometimes called 'carbon display') is the act of making publically available the quantitative outcome of a carbon footprint calculation. It is often associated with putting a label with a carbon number on a commercial product. The Carbon Trust (UK) has pioneered a first draft of a carbon label, which reports the carbon footprint in g CO₂-eq., with a commitment from the producer to further reduce this figure within 2 years.

¹ http://www.iso.org/iso/catalogue_detail.htm?csnumber=52423