

EUROPEAN COMMISSION INCEPTION IMPACT ASSESSMENT ON THE SUSTAINABLE PRODUCTS INITIATIVE

A.I.S.E. position

3 November 2020

A.I.S.E. welcomes the objectives of the 'Sustainable Products Initiative'. A holistic approach towards sustainability, incl. social, environmental and economic aspects should be taken, also using the potential of digitalisation.

A.I.S.E. calls for measures that:

- are based on sound science and in consideration of impacts across the full life cycle of the product and its packaging;
- are developed in a consistent and coherent way with all existing (and applicable) legislation;
- stimulate innovation and competitiveness of the EU industry in a well-functioning more harmonised Single Market, allowing free movement of products, avoiding divergent policy measures among the Member States.

Widening scope of Ecodesign Directive

Should the scope of the Ecodesign Directive be widened, A.I.S.E. recommends excluding the vast majority of A.I.S.E. product categories, because focus of the renewed Directive should be on those product categories for which Ecodesign is the most appropriate regulatory tool.

Sustainability principles, addressing environmental sustainability

A.I.S.E. suggests considering industry voluntary initiatives or self-regulation as an effective approach to demonstrate compliance with product sustainability principles, given that self-regulation and voluntary initiatives have resulted in major and measurable environmental improvements. Good examples for our industry sector are the Charter for Sustainable Cleaning (see Charter KPI commentary) and industry compaction projects (see A.I.S.E. factsheet on compaction). Those have contributed significantly to policy objectives, which are being addressed via the Green Deal. A.I.S.E. is open to initiating a dialogue with the Commission (and other stakeholders) to develop common, measurable sustainability goals that the industry will bring to life via existing or new voluntary initiatives.

Sustainability principles, addressing social aspects throughout the product lifecycle

A.I.S.E. suggests to not cover social aspects throughout the product lifecycle, but to integrate CSR into company policies instead – which is common practice in our industry sector. A.I.S.E. has issued specific 'Social Responsibility Guidance' and a toolkit (www.aise.eu/csr).

Digitalisation and mandatory sustainability labelling / Digital product passport

Consumers are actively looking for more information about products. At the same time, there is increasingly less space to communicate this information on-pack due to product compaction and packaging reduction in our industry sector. Digitalisation, provided it follows the principles of transparency, can enable consumers to access relevant product information when label space is limited or even absent. A.I.S.E. has been conducting pan-European consumer surveys and

findings demonstrate the need to get products labels to be further optimised and to move towards digital tools for supplementary information. Digitalisation can offer additional benefits such as direct language access, information customisation, etc.

Furthermore, A.I.S.E. would like to point out that PEF/OEF have a long-term potential but currently faces unresolved challenges. Also, sound LCA studies and other scientifically robust assessment methods should be taken into account; see A.I.S.E.'s contribution – especially on PEF/OEF – to the roadmaps on 'Empowering consumers for the green transition' and 'Substantiation of environmental claims' / www.aise.eu/pef).

Increasing recycling and recycled content

A.I.S.E. welcomes the consideration to increase recycling and recycled content. However, including concrete targets should be avoided, especially at specific material or packaging formats. This could unfairly favour certain actors on the market over others and hinder investments in innovations and developing new recycling streams. Should the Commission decide that setting targets for recycled content is essential, then these should be set as 'minimum content' that is achievable across a sector.

