

EUROPEAN COMMISSION ROADMAP ON EMPOWERING THE CONSUMER FOR THE GREEN TRANSITION

A.I.S.E. input

27 August 2020

A.I.S.E. welcomes the work initiated by the European Commission to improve consumer information and strengthen consumer protection against commercial practices that are contradictory to the Green Deal and especially to the new Circular Economy Action Plan objectives, e.g. false and not substantiated product claims.

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;
- developed in a consistent and coherent way with existing legislation.

A.I.S.E. recommends that the disclosure of environmental impact information should remain voluntary (and focused on internal company eco-design applications as opposed to product comparisons) until the methodology is mature and robust enough. To support that work, an update of the 2013 Recommendation based on the outcome of the 2013-2018 pilot phase, should help clarify rules and responsibilities for market players.

Substantiation of environmental claims using PEF/OEF methods / Contribution of household consumption to the Green Deal objectives

In principle, A.I.S.E. supports the proposal to substantiate environmental claims through PEF/OEF. Learnings from A.I.S.E.'s official PEF project on household liquid laundry detergents (2013 – 2019) are that the PEF/OEF method is judged overall as moving into the right direction as it is intended to evaluate and reduce the environmental footprint, based on a European-wide harmonised LCA-based approach.

However, PEF is not yet sufficiently mature for product-to-product comparisons for the purpose of B2C communications due to the reliance on generic data for key common life-cycle stages. It is generally recognized that PEF practice is still evolving and impact methods are complex for consumers to understand (see attached report on A.I.S.E.'s PEF communication research) and not mature to allow comparative assessments (see also www.aise.eu/pef).

It should also be noted that PEF does not help substantiate certain environmental claims (eg. biodegradability, recyclability, etc). The premature deployment of PEF in the market (B2B, B2C) could therefore potentially damage the PEF reputation and limit its adoption longer term. Based on the A.I.S.E. PEF pilot project, A.I.S.E. has identified some limitations or recommendations for improvement:

• *Internal use*

- Product and packaging eco-design and sourcing based on PEF can inform design decisions and positively influence the environmental impact.

- *Use in B2B context*
 - Improvement of upstream processes (data collection from suppliers, optimisation of raw material transport, sourcing, and production of raw materials, etc.).
 - PEF results can be used to inform retailers and customers on relevant life-cycle stages, impact categories, processes and measures taken by manufacturing companies, but A.I.S.E does not recommend using product specific PEF results.
- *Use externally with consumers (B2C)*
 - A.I.S.E. recommends NOT to disclose individual quantitative PEF results to consumers based on the insight that PEF category rules are not yet sufficiently mature to provide accurate product comparisons.
 - In case a company wants to apply claims on its product, a PEF study may help to substantiate whether a claim is relevant and not misleading. Burden shifting must be avoided. It would at this stage be premature to require mandatory use of PEFCR to substantiate or guide environmental claims.
 - Due to the importance of the use phase, consumer engagement is key. Reduction of carbon footprint (addressed via low temperature washing advice) and other good consumption behaviours are relevant. A.I.S.E. recommends common best use tips for consumers (Our industry has developed common and harmonised best use tips for several product categories; see www.cleanright.eu).

Proliferation of sustainability logos and claims

A.I.S.E. agrees in principle on the objective to reduce the number of logos and claims, when those are not substantiated by science and/or life cycle based. However, there can be good reasons for the co-existence of different schemes, especially when those complement each other – like the EU Eco-label and the A.I.S.E. Charter for Sustainable Cleaning in our industry sector. Whereas the EU Eco-label targets a narrow sub-set of the best environmentally performing products, the A.I.S.E. Charter is a more comprehensive framework, that is already operational to products, including a comprehensive company dimension, advanced sustainability product standards and a monitoring system (see www.sustainable-cleaning.com):

- Charter product standards are LCA and science-based, addressing the most relevant environmental impacts. Products fulfilling those product standards are authorised to carry a specific Charter product logo, enabling consumers make a better choice.
- Independent third-party verification guarantees that all companies are individually assessed on the same basis.
- Over the last 15 years, A.I.S.E. can demonstrate sustainability progress for the whole industry sector in Europe. For instance, in Europe the industry sector has reduced GHG emissions by 44% since 2006 and 2019 (see attached Charter KPI commentary).

