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Public consultation on the EU product policy

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Introduction

In 2015, the EU adopted the Circular Economy Action Plan. One of the actions in that plan is to analyse the existing framework of EU policies for products. The wide range of products on the EU single market are subject to many different EU policies that vary in scope, type and approach. These policies include different forms of legislation, guidance and financial and/or market incentives. They have various policy aims such as ensuring the safety of people that use or consume the products, maintaining fair competition on the EU internal market, climate change mitigation, protecting the environment, providing consumer protection and promoting more sustainable products. While these aims are consistent with circular economy generally, the policy tools have been developed in their own context, without necessarily taking into account the transition that the EU is making to a low carbon, circular economy.

In this work we aim to focus on product categories where available evidence indicated there is high potential for circular economy, and on EU policy tools that are capable of and/or already addressing that potential, partly or fully. The contributions to this public consultation will be used by the Commission when preparing a Commission Staff Working Document containing the analysis of in how far EU product policy tools are facilitating the transition to the circular economy and possible gaps or obstacles that hinder the objectives to be achieved.

About you

*Lang	guage of my contribution
	Bulgarian
	Croatian
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- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- GaelicGerman
- Greek

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*I am	giving my contribution as
0	Academic/research institution
0	Business association
0	Company/business organisation
0	Consumer organisation
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0	Environmental organisation
0	Non-EU citizen
0	Non-governmental organisation (NGO)
0	Public authority
0	Trade union
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FIRST	name
G	tiorgia
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* Ema	il (this won't be published)
	in (this work be published)
g	iorgia.concas@aie.eu
* Ora:	anisation name
_	character(s) maximum
A	IE - EU Electrical Contractors Association
* Oraa	anisation size
	Micro (1 to 9 employees)

	Small (10 to 49 employ	ees)					
	Medium (50 to 249 emp	oloye	es)				
	Large (250 or more)		,				
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	American Samoa		Egypt		Macau		Príncipe
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	Antigua and Barbuda		Ethiopia		Mali	0	Sierra Leone
	Argentina	0	Falkland Islands	0	Malta	0	Singapore
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	Bolivia	0	Grenada		Namibia		Sweden
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	Eustatius and Saba						
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	Herzegovina						
	Botswana	0	Guatemala		Netherlands		Taiwan
	Bouvet Island		Guernsey		New Caledonia		Tajikistan
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0	British Virgin Islands	0	Guyana	0	Niger	0	The Gambia
0	Brunei	0	Haiti	0	Nigeria	0	Timor-Leste
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	Burkina Faso		Honduras		Norfolk Island		Tokelau
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	Colombia		Jersey		Poland		Uruguay
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	Congo		Kazakhstan		Puerto Rico		Uzbekistan
	Cook Islands		Kenya		Qatar		Vanuatu
	Costa Rica	0	Kiribati		Réunion		Vatican City
	Côte d'Ivoire		Kosovo		Romania		Venezuela
	Croatia		Kuwait		Russia		Vietnam
	Cuba	0	Kyrgyzstan		Rwanda		Wallis and Futuna
	Curaçao	0	Laos		Saint Barthélemy		Western Sahara
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	Czech Republic		Lebanon		Saint Kitts and Nevis		Zambia
	Democratic Republic of the Congo		Lesotho		Saint Lucia		Zimbabwe

Denmark Liberia		Saint Martin
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Anonymous

Only your type, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

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1. EU product policies

The EU has rules and policies to address products on the EU common market. They generally aim to ensure consumers can safely use or consume products, or to make products more sustainable. In this survey, 'sustainable' means products made in a way that limits negative effects on the environment and climate and ensures resources for products do not run out. Setting EU rules also allows for fair competition because they set the same requirements for all products on the EU market (level playing field).

1.1. To what extent do you agree with the following statements?

	Strongly agree	Agree	No opinion/ don't know	Disagree	Strongly disagree
The EU should set rules for products on the EU market to limit their impact on the environment	•	0	0	0	0
The EU should set rules to make sure products have a long lifetime.	0	•	0	0	0
The EU should promote products with reduced environmental impact, for example through labels	•	0	0	0	0
The EU should set rules and rights to help consumers to engage in the circular economy (e.g. additional consumer rights to repair)	0	•	0	0	0
Rules for these issues would be better set by the Member States than at EU level	0	0	0	•	0

Please explain your answers in this section and/or add any views on EU product policies in general 200 character(s) maximum

We are very much in favour of EU initiatives to reduce the environmental impact of products and the professionals we (AIE) represent play a key role in delivering sustainable products to Europeans.

1.2 When setting rules and policies aimed at reducing the negative environmental effects of products, which types of products should the EU give priority to?

- The EU should aim to reduce effects on the environment of all products
- The EU should prioritise the products with the highest impact on climate, the environment or use of resources
- The EU should prioritise those products where significant improvements can be made at lowest cost to producers and consumers
- The EU should prioritise products produced on a large scale for the European market
- The EU should not be setting such rules and policies for products
- Other

1.3 Policies in different phases of the product life cycle

The rules and policies the EU has in place for products are aimed to influence products in different phases of the product life cycle: from design and production to the waste / end-of-life phase. Which of the following approaches do you consider an effective way to achieve the goals as described at the beginning of this section?

	Very effective	Somewhat effective	No opinion/ Don't know	Not very effective	Not at all effective
Design/production phase Setting minimum performance standards (for instance in terms of use of energy and other resources for products on the market <i>e.g. through the EU Ecodesign directive</i>)	0	•	0	0	0
Restricting the use of certain hazardous substances or chemicals (e.g. the Directive on the Restrictions of Hazardous Substances in electrical and electronic equipment (RoHS) and the Registration, evaluation and authorisation of chemicals (REACH) regulation)	0	•	0	0	0
Setting safety standards and product certifications (through CEN/CENELEC standards)	0	•	0	0	0
Making producers pay for the waste their products will cause (e.g. Extended Producer Responsibility schemes)	0	•	0	0	0
Consumption/procurement phase Public authorities giving priority to environmentally friendly products when buying products (Green public procurement)	0	•	0	0	0
Ensuring consumers have information on the impacts of products, so they can choose the best environmentally-performing products (e.g. Energy labelling, EU Ecolabel)	0	•	0	0	0
Verification of the performance of new technologies and materials (Environmental Technology Verification)	0	•	0	0	0
Supporting longer product lifetimes through extended product warranties /commercial guarantees for products	0	•	0	0	0
Supporting longer product lifetimes through better and cheaper repair options	0	•	0	0	0

Encouraging sharing and reuse of products so they are used more intensely and effectively	0	•	0	0	0
Providing consumers information on the durability and reparability of products	0	•	0	0	0
Waste/end-of-life phase Setting requirements and targets for the correct handling of waste (Waste legislation)	0	•	0	0	0
Specifically targeting certain waste streams with high impact (e.g. in the directives on Waste from Electrical and Electronic Equipment (WEEE), and on End-of-Life Vehicles (ELV))	0	•	0	0	0

If you wish to add any comments on your answers or on policies in the different phases of the product life cycle, you may do so here.

200 character(s) maximum

ecodesign and energy labelling measures should refer to final energy, not primary energy, or to carbon footprint; ecodesign makes sense for products, but not for systems/installations.

1.4 Electrical and Electronic Equipment (EEE)

1.4 Electrical and Electronic Equipment (EEE)
The EU has legislation and other policy instruments for electrical and electronic equipment, such as TVs, washing machines, fridges, vacuum cleaners and computers.
a. How familiar are you with the EU rules and policies for this sector?
Very familiar
Quite familiar
Somewhat familiar
Not very familiar
Not at all familiar
b. Do you think the sustainable design and production of these products are adequately covered by EU policy instruments (such as the EU Ecodesign Directive and the Directive on restriction of hazardous substances in EEE)?
Adequately covered
Inadequately covered
Not covered at all
O Don't know
c. Do you think there are sufficient EU policy instruments providing consumers with information on sustainability for these products (such as the EU Energy label and the EU Ecolabel)? Sufficient Insufficient Not covered at all Don't know
d. Do you think there are sufficient EU policy instruments covering the end-of-life / waste handling of these products? (such as the directive on Waste from Electrical and Electronic Equipment) Sufficient Insufficient Not covered at all Don't know

e. What do you usually do with old appliances you no longer need?

Try to sell to second-hand store or online
 Return to a store selling similar appliances
 Bring to waste sorting centre / recycling centre

Give away to friends or a charityDiscard with the municipal wasteOther
Please briefly explain your answers to these questions and add any further comments 200 character(s) maximum
there are sufficient ecodesign measures; they however build on an artificial, misleading, in-transparent parameter: the Primary Energy Factor; there is no need for measures for systems/installations.
1.5 Furniture
The EU has legislation and other policy instruments for furniture, for example on chemicals that are allowed to be used (REACH).
a. How familiar are you with the EU rules and policies for this sector?
Very familiar
Quite familiar
Somewhat familiar
Not very familiar
Not at all familiar
e. Do you regularly purchase second-hand furniture? Yes, I prefer second-hand furniture (if still in good shape) because it has proven to be durable Yes, if the price is significantly lower than for new furniture No, I prefer new furniture No opinion / Don't know Please briefly explain your answers to these questions and add any further comments 200 character(s) maximum
1.6 Textiles (clothing, footware, carpets, etc)
The EU has legislation and other policy instruments for textiles, for example on chemicals that are allowed to be used (REACH) and on labelling of textiles (textiles regulation).
a. How familiar are you with the Ell rules and policies for this sector?
a. How familiar are you with the EU rules and policies for this sector?
Very familiar
Quite familiar
Somewhat familiar
Not very familiar

e. Would you be willing to pay a somewhat higher price for clothes, carpets or shoes if you were
convinced they were more sustainable?
Yes, if they are better for the environment
Yes, if there are guarantees they were produced under good working conditions
Yes, if they will have a longer lifetime
No, I choose my clothes based on other reasons, such as fashion and price
Please briefly explain your answers to these questions and add any further comments
200 character(s) maximum
1.7 Toys
The EU has legislation and other policy instruments for toys. The toys regulation covers toy safety, while
the materials that can be used are regulated by instruments such as the REACH Regulation.
a. How familiar are you with the EU rules and policies for this sector?
Very familiar
Quite familiar
Somewhat familiar
Not very familiar
Not at all familiar
e. When purchasing toys, is their environmental impact a big factor in your choices?
No, price and safety are my only considerations
Price and safety are the most important, but I also consider environment
Yes, environment is as important as safety and price
Please briefly explain your answers to these questions and add any further comments
200 character(s) maximum
2 Public expectations and trust in information on products
Products generally come with a label or manual that contains information on the ingredients or component
of the product. In some cases further information is provided, for example on environmental impacts. The

EU influences requirements for this information through various rules and other policy tools. Please answer the following questions, keeping in mind we are referring to a wide range of products, (food and

2.1 To what extent do you agree with the following statements?

drinks, electric devices, textiles, furniture, etc).

Not at all familiar

	Strongly agree	Agree	No opinion/ don't know	Disagree	Strongly disagree
I prefer buying products with labels stating that they perform well in terms of their impact on the environment	0	•	0	0	0
Price is the only aspect that I look at when buying products	0	0	0	•	0
I generally rely on brand reputation as regards quality and technical performance	0	0	0	0	0
I do not trust information on labels	0	0	0	•	0
There are too many different and confusing labels around that provide environmental information	0	0	0	•	0
I do not trust information provided by producers themselves	0	0	0	0	0
I would be willing to pay more for a product if I could be sure it is more sustainable	0	0	0	0	0
I often look for information on quality, durability or sustainability of products in specialised magazines or on Internet	0	0	0	0	0
Claims on sustainability made on product labels should be verified by a public EU body	©	0	0	0	•
Environmental information and functional performance should be verified by an independent 3rd party	0	0	0	0	0
I have the impression producers purposely make products that do not last long	0	0	0	0	0
I would prefer to buy products that can easily be repaired	0	0	0	0	0

2.2 How important is it to you that the following information is made available on products?

	Very important	Quite important	No opinion / don't know	Not very important	Not at all important
Ingredients/components	•	0	0	0	0
Place of manufacturing of product and/or components	0	•	0	0	0
Production type (organic, covered by an environmental management system, etc.)	0	•	0	0	0
Information on a single specific environmental issue (e.g. climate change)	0	0	0	0	0
Information on environmental impacts of the product during its whole life cycle (use of resources, manufacturing, transport, use, waste or recycling, etc.)	0	•	0	0	0
Information pointing to environmentally excellent products, so as to choose the best products (e.g. through ecolabels such as the EU Ecolabel)	0	•	0	0	0
Information on the environmental performance of the specific product in comparison to the average performance of the product on the EU market (e.g. better, average, worse)	0	0	0	0	0
Information on the technical performance of the product, especially for innovative or technology products	0	•	0	0	0
Information on life expectancy of a product	0	•	0	0	0
Information on how easily a product could be repaired when broken	0	0	0	0	0
Information about how and where the product and its components can be recycled	0	•	0	0	0

2.3 Familiarity and trust in labels

Please answer a few short questions regarding the labels described below.

The EU Ecolabel



Are you familiar with the EU Ecolabel?

- Yes, very familiar
- Yes, somewhat familiar
- Not very familiar but it rings a bell
- Not at all familiar

Other Ecolabels

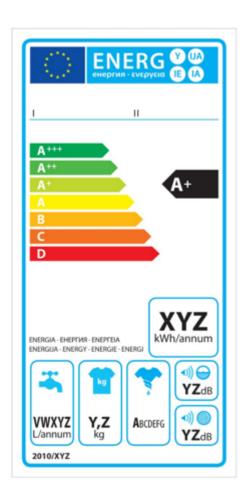




Are you familiar with such labels?

- Yes, very familiar
- Yes, somewhat familiar
- Not very familiar but it rings a bell
- Not at all familiar

EU Energy Label



Are you familiar with the EU Energy label?

- Yes, very familiar
- Yes, somewhat familiar
- Not very familiar but it rings a bell
- Not at all familiar

Would you prefer a product with this label on it (with a good score) over one without (or a bad score)?

- Yes, strong preference
- Maybe, if I was undecided it could make the difference
- No, it plays no role in my decision

Do you know which aspects are covered by this label?

- No, I don't know
- I don't know precisely which aspects are covered but know where to find this information
- I have a general idea of the elements covered
- I know the aspect I consider most important is covered (e.g. impact on climate)
- I know what aspects are covered

Labels for specific materials, such as wood, palm oil or fish



The mark of responsible forestry





Are you familiar with such labels?

- Yes, very familiar
- Yes, somewhat familiar
- Not very familiar but it rings a bell
- Not at all familiar

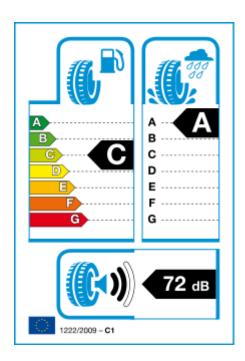
EU organic farming



Are you familiar with the EU organic farming label?

- Yes, very familiar
- Yes, somewhat familiar
- Not very familiar but it rings a bell
- Not at all familiar

EU tyre label



Are you familiar with the EU tyre label?

- Yes, very familiar
- Yes, somewhat familiar
- Not very familiar but it rings a bell
- Not at all familiar

If you want to, you may give any comments or further reflections on the different labels here

2	00 character(s) maximum		

Partially
O No
No opinion
If you replied "partially" or "no", please explain what in your view is missing
energy performance of products should always be calculated in final energy consumption only, as this is the only objective and tangible parameter; primary energy should no longer be referred to. Carbon footprint could also be indicated, as this is the most important factor.
2.5 Would you like to have more environmental information beyond what is displayed on the product itself (e.g. online)? © Yes
Only if it is easily accessible and understandable
 Only if it is provided by organisations independent from the producer (e.g. public databases, consumer organisations, etc.) No
No opinion
2.6 Did you ever encounter a label or environmental information that you would qualify as misleading? O Yes No
3. The EU Ecolabel
The EU Ecolabel can be displayed on products if they meet certain criteria set at EU level, so that consumers know the products live up to the highest environmental standards.
Would you be willing to answer a few questions on the EU Ecolabel? Yes No
4. Opinions on the Environmental Footprint methods and their policy applications
Between 2013 and 2018, the Commission ran a pilot phase for applying methods to measure the environmental impact (or footprint), of products and organisations. These are called the Product

Environmental Footprint (PEF) and Organisation Environmental Footprint (OEF) methods. 27 different industry sectors (covering more than 60% of the EU market on a consumption basis), Member States, and some NGOs took part on a voluntary basis. They tested how to develop product and sector specific harmonised calculation rules, how to verify the information and how to communicate it to consumers,

businesses and other stakeholders. After the conclusion of the pilot phase, the Commission is considering the next steps. Some of the questions below might be difficult to answer without any knowledge of the

Environmental Footprint methods or pilot phase.

2.4 As a consumer, are you satisfied with the environmental information available on products?

Yes

The European Commission is running <u>targeted consultations</u> on the potential future use of the Environmental Footprint methods. They are targeted to businesses and business associations, investors, NGOs, public administrations and method/ initiative owners.

4.1 Would you be willing to answer	a few questions rela	iting to the Environm	ental Footprint
methods?			

- Yes
- No

5 Closing

5.1 Do you have any further comments or suggestions on how the EU should address sustainability of products?

400 character(s) maximum

Ecodesign and energy labelling measures are suitable for products; but performance of systems and installations should be addressed by installation requirements, or inspections or monitoring tools. The Primary Energy Factor is an artificial, arbitrary and in-transparent parameter. It should be replaced by reference to final energy consumption, which is objective and tangible.

5.2 If you would like to, you may upload your position paper or other relevant document here.

The maximum file size is 1 MB
Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Contact

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