

Minutes of the expert groups

Meeting of the European Union Eco-labelling Board (E00374)

20-21 March 2017, room Walter Hallstein, Berlaymont

1. Approval of the agenda and of the minutes of previous meeting

The agenda was approved as well as the minutes of the previous meeting.

2. Nature of the meeting

This was a meeting attended by members of the European Union Eco-labelling Board.

3. List of points discussed

UPDATE ON REFIT – DG ENVIRONMENT (EC)

EC – informed that it is unlikely that the REFIT will be published in Q1 2017 as there are still discussions over its finalisation. The report drafted by the technical services is now at the political level. Messages from Member States (MS) and stakeholders have been received and have been an important element in discussions and a determining factor in the finalisation of discussions. EC ensured that any decisions regarding the future of product groups will follow the formal process, which will include consultation. EC encouraged MS and stakeholders to provide information/data in support of the EU Ecolabel and its role in business growth.

UK - raised the issue of converted paper products. At the EUEB in November 2016, it was agreed to go for a prolongation of that product group (PG), however it is not progressing. UK identified a large multinational company preparing an application under that PG, but the assessment of the application has been put on hold. How will this problem be addressed? How is it linked to REFIT?

EC – encouraged presenting such information to the EC in writing, particularly as regards the potential economic impact that such situation may lead to. EC indicated that the delays are linked to the REFIT. Paper-related PGs are currently under discussion.

President - highlighted that the problem affects other MS too. MSs need at least a hint that the PGs under discussion will be prolonged. The President asked other MSs to write to the EC about how they would be affected.

EC - encouraged sharing of concrete cases of companies having invested/wanting to invest in the EU Ecolabel, noting that the bigger the name and turnover, the larger the impact of such information.

BEUC / EEB – MSs and industry have expressed their concern, but we are still in uncertainty. Are other PGs (such as hard coverings) affected by the same problem? The Circular Economy Action Plan is high on the political agenda, and there is point on the EU Ecolabel. Asked how the EC plans to meet this point given the delays with the REFIT? Letters were sent by industry/stakeholders to the EC. It was replied that some PGs are not to be prolonged based on limited interest from industry, and that decision on other PGs will be based on the conclusions of the REFIT. The EU Ecolabelling Board/the JRC need to be consulted. Noted that EC should not take fast decisions on discontinuing PGs without consulting, and knowing all the rationale behind. Discontinuing PGs is a way to get rid of the EU Ecolabel.

EC - took note of concerns that relate to the way decisions are taken on PGs, the need to respect the consultation mechanisms in place. We will convey these messages. We will do our utmost to advance in the discussions. The way of dealing with PGs and uptake will be part of the Action Plan following the REFIT. Today, we will give some indications on how we propose to move forward.

PRESENTATION ON PRODUCTS GROUPS ON WHICH THE EU ECOLABEL SHOULD FOCUS – DG ENVIRONMENT (EC)

EC - noted that targets and objectives are a difficult thing when dealing with voluntary measures. Noted the need to assess contribution of the EU Ecolabel to the Circular Economy Action Plan, for example in the context of monitoring indicators for a Circular Economy. Invited to keep an eye on future discussions on this monitoring framework and on whether ecolabels are a useful indicator for Circular Economy in the sphere of consumption.

FSC - asked what the EC means regarding products not being covered by "competing labels". What does the EC considers as a "competing label"?

EC - the intention is not to exclude PGs covered by other ecolabels but rather to examine the added value of an EU Ecolabel for well-established PGs covered by other labels.

Euratex - asked if harmonisation is part of added value? Asked if PEF (environmental footprint) is within the scope of this discussion?

EC - noted that regarding the relationship between the PEF pilot and the EU Ecolabel, the EC will look at all options regarding to what extent PEF methods should be integrated in EU Ecolabel criteria development. There will be a consultation process throughout the rest of the year and a PEF conference by the end of the year. We will also consult the EUEB on what the implications should be for the EU Ecolabel. Noted that mutual recognition is a powerful tool, but it would need to be discussed in a possible context of a change of the EU Ecolabel Regulation. There will be a full consultation.

Hildo Kropp - noted that industry would appreciate to see mutual recognition. Noted that the Uptake Task Force should have started looking at PGs/labels that are successful, not the other way around. Argued for the need to engage with people within companies who are thinking "out of the box" when developing criteria (seeing as the label is meant to target 10-20% of the market). This could take the form of an advisory board with representatives thinking "outside of the box", not related to the EUEB.

EC - noted that there are ad hoc working groups during the criteria development process. But the EC wants to interact more with stakeholders, even before the start of the criteria development process. We need to know that there is true interest in the EU Ecolabel. The EC is currently setting webinars/conferences to have exchanges with stakeholders. Acknowledged need for greater discussions.

FR - reiterated questions regarding PEF. FR presented a position paper in July 2016. Concerning new PGs, FR believes that games, toys and smartphones should be considered. Requested an update on developments around PV panels.

EC - noted PEF has the potential to be included in a number of instruments. Acknowledged that those suggested PGs are indeed very interesting but we need to assess whether there is a critical interested mass of producers (market recognition). Regarding mobile phones, there are Ecodesign and Energy labelling measures and a feasibility study ongoing. Innovation and product turnover may pose difficulties for EU Ecolabel certification. PVs will be part of the update later in the day.

NO – congratulated the EC on the presentation. Noted that the EC needs to make up its mind regarding what it wants from the EU Ecolabel. Then, NO will support and help develop a strategy. We need to add to the PG assessment: is the EU Ecolabel the right tool for a given PG? Sometimes, it might be better to have a regulation. Noted that the main problem with using market demand/suitability is that the industry tends to say that the EU Ecolabel is a great tool but it is not suitable for their product. Noted that setting standards (as part of criteria) can itself drive innovation. It can take time before the market is mature. Under the Nordic Ecolabel, there are cases where there can be a long period where no one applies for the label, and then suddenly, everybody does. Noted that the EU Ecolabel is not only an environmental tool but also a marketing tool for industry. If the industry cannot increase market share thanks to the EU Ecolabel, then there is no use to have it. Noted that more funding is needed for marketing efforts.

UK – thanked for the presentation. Noted that many of the issues presented have been well known to the EUEB. Asked what happens next and when? Noted the need for an implementation plan. Noted the need for a clear strategy and a vision as to how various policy instruments interact. Noted that there isn't a clear vision in the current EU Ecolabel Regulation; proposed possibility of an amendment/revision. Noted that issues around Article 6 are a major obstacle. Noted the need to revisit the study of IPTS (on relevance of some products) and revisit market penetration of PGs since it is this and visibility that counts, not the number of licences and companies certified.

DK - wondered why the tissue paper PG is on the table. Noted that while the EUEB is trying to set some guidelines on how to decide on PGs, others are deciding randomly to abandon certain PGs. Does not understand what is going on.

BEUC/EEB - congratulated DG ENV team on this initiative and on the recent communication efforts (webinars etc.). We are still missing a clear picture on where the EU Ecolabel stands. Noted that the Energy Label does not cover either resource efficiency nor chemicals. Therefore, there is a need for product policy coherence and a need to consider

these interactions/synergies when considering abandoning PGs. Highlighted the strong link between the EU Ecolabel and GPP. Didn't fully agree that EU Ecolabel shouldn't focus on PGs covered by other well established labels because the EU Ecolabel covers the whole EU market and it is not a private label and addresses a wide range of aspects. Noted the need to keep in mind what is in the EU Ecolabel for consumers? What is in the EU Ecolabel for producers? Noted the need to focus on aspects other than environment, such as health and safety – and to communicate on this. What incentives are we giving to companies to apply for the EU Ecolabel? What are our available resources? In the context of the Circular Economy Action Plan, the EU Ecolabel needs more resources, not less. Argued for the need to invest more resources in communication and visibility of the label, and that the best way to communicate/promote is to see the label on the shelves of supermarkets.

EC - noted that the EC is already acting on a number of points mentioned. Reminded that communication on the EU Ecolabel shouldn't come only from Brussels only, and called for action from MSs. Acknowledged the need to consider whether there will be a need to change the EU Ecolabel Regulation following the REFIT. EC also invited for written feedback on this presentation.

PRESENTATION ON THE STREAMLINING OF EU ECOLABEL CRITERIA DEVELOPMENT – JOINT RESEARCH CENTRE (EC)

EC - noted there are limits to taking shortcuts in the EU Ecolabel Regulation. If the EUEB really believes that we should shorten and streamline further than what was presented, we must reflect on possible changes to the Annex of the Regulation.

NO - argued that there is no need for such extensive evidence reports as the JRC is currently producing. Nothing is preventing us from shortening that. What we need are technical consultations with stakeholders and sufficient explanation of why the criteria are set as they are. So it can be simplified. Also, other MS have noted that we are 'overdoing it'.

JRC - replied that what in fact takes time is the setup of the process they have to follow, from the consultation phase until arriving at the regulatory vote stage.

NO - noted that in their experience, it was easier and better to have an ad hoc working group and talk to industry directly.

Hildo Kropp - noted that it is easier when you know in advance what the existing positions of stakeholders are – so a prior meeting with stakeholders would allow for an exchange of positions before criteria development.

BE - noted that what can also be time consuming is the collection of data – recommended to start data collection earlier, already from the first application.

FR - noted that criteria on chemicals take a lot of time – could ask industrialists to show that there are no alternatives. Recommended to reduce the number of PGs rather than degrade preliminary work.

President- noted the need to identify what is the obstacle to shortening the criteria development process.

PRESENTATION ON THE REVISED PUBLIC PROCUREMENT DIRECTIVE – DG ENVIRONMENT (EC)

EC – presented the EU GPP policy framework and the instruments and tools developed by the Commission in order to support the uptake of GPP in the EU. The EU GPP criteria development process has been presented, underlying similarities and differences compared to the EU Ecolabel. Criteria for both tools are developed in parallel when relevant but major product groups for GPP (e.g. transport, buildings, food) are not covered by EU Ecolabel. EU GPP criteria usually are a simplified version of EU Ecolabel criteria and are formulated so that EU Ecolabel products are meeting the technical specifications required. After a short look back on the rules on the use of labels under the previous public procurement directive, the rules from the procurement reform have been presented. Public authorities can now require a specific label as means of proof when asking for environmental requirements, provided some conditions are met. One of these conditions is that the requirements must be linked to the subject matter and appropriate to define the characteristics of the works, supplies or services that are the subject matter of the contract. For example, it is not allowed to make requirements on the overall company policy requirements. If not all requirements are linked and appropriate contracting authorities can require those label requirements which are linked and appropriate. The main challenging aspects and open questions related to the use of labels in public procurement have been highlighted and the need to be careful in the formulation of the EU Ecolabel criteria to enable direct use in public procurement, also when it comes to verification, have been presented.

DK – thanked for the presentation and commented that it's very important for the EU Ecolabel to have focus on the EU GPP policy so that's another area where we need to be ready to cooperate even though there are some difficulties in the use of ecolabels in GPP.

BEUC/EEB – asked clarifications on what it is meant with the need of defining criteria for EU Ecolabel in a way that will fit all the legal obligation of the procurement directive. Does this mean for example that we cannot set criteria for labour conditions on textiles? Will the training activities in preparation that have been mentioned include explanation on how to use EU Ecolabel for GPP? GPP criteria for textiles, furniture and paints are still under development but we approved the EU Ecolabel criteria very long time ago and BE was surprised to see them still under development.

EC - on the question on corporate social responsibility and the criteria, clarified that it will not be possible for public authorities to directly ask for ecolabelled products if criteria on overall corporate social responsibility are included. Nevertheless it will be possible for them to choose those requirements underlying the EU Ecolabel that are linked to the subject matter of the contract and integrate them into a tender. The EU Ecolabel will be then used as means of proof for those requirements. The foreseen training activities will for sure include a part on the use of ecolabels in GPP. The approval of GPP criteria for furniture, textiles and paints have been delayed because of discussions with other services but they are now at the very last stage of the process and they will probably be published within two or three months.

DK – reported that in Denmark it's probably possible to put into the tender that the bidders should commit themselves to get an EU Ecolabel within a certain time, not before getting the contract, but during the execution of the contract. If that is correct, it would be much easier for public procurers to do instead of having to look into alternative documents.

EC – replied that a final legal assessment on this point could not be given. This was discussed with Member States and DG GROW but the overall feeling was rather reluctant on this possibility. This is a very good point that should be further investigated.

President – commented that this is a very interesting point and a solution is needed.

BE- asked if there are product groups in GPP where there are no EU Ecolabel criteria yet and there would be opportunities for EU Ecolabel, since there is already work done in GPP.

EC – replied that for example street lighting, cars, food and catering and datacentres are included in GPP.

UK – noted that for example datacentres could be a product group of interest for EU Ecolabel and maybe there is some scope there to thinking about including that within the EU Ecolabel work plan.

EC – reminded that a strong interest from the industry would be required to use the EU Ecolabel proactively as a marketing tool and datacentres could be an obvious candidate for a joint analysis on whether there is something in it for ecodesign, energy labelling and/or EU Ecolabel.

NL - noted that Blue Angel criteria exists for datacentres and in NL criteria exist for the climate control of the datacentres and this is a very interesting product group although very hard to tackle because is very technical. If there is a possibility to further exploring the development of EU Ecolabel criteria for this product group, in parallel with GPP.

PRESENTATION ON GENERAL UPDATES – DG ENVIRONMENT (EC)

BE - asked if it would be possible to amend the user manual for Textiles. Noted that regarding cleaning services, it is a missed opportunity that consumable goods are not an optional criterion. Asked if it is possible for companies to offer both EU Ecolabel cleaning services and other cleaning services?

EC – Indicated that clarifications will be provided at the CB Forum. On consumable goods, the client has all the power.

BE – regarding the presentation on alignment to the Lisbon Treaty, asked about the meaning of 'non-substantial elements'.

EC - clarified that in legal terms, 'substantial' refers to the EU Ecolabel Regulation and 'non-substantial' is everything that follows from that (ex. PG criteria).

UK - asked about the difference between the assessment by the JRC and the assessment by the Uptake Task Force. Asked whether the uptake of the EU Ecolabel for imaging equipment will be examined.

EC - replied that the uptake will be looked at but also whether companies are interested in an EU Ecolabel for imaging equipment in general.

FR - asked whether the leaflet would be translated. Noted that it would be more useful to study uptake before launching a revision.

EC – informed that the brochure will be translated in all EU languages, and this will be done as soon as possible.

BEUC/EEB - recommended examining why certain PGs of Blue Angel or Nordic Ecolabel have licences while those of EU Ecolabel do not. Noted that the EU Ecolabel on imaging equipment lack criteria on emissions from the machines/indoor quality.

BE – agreed with the remark of FR on the need to study uptake.

EC – took note of the remarks made.

PRESENTATION ON THE SUPERSMART PROJECT SUPPORTING INTRODUCTINO OF A NEW EU ECOLABEL FOR SUPERMARKETS – INGRID CAMILLA CLAUSSEN (SINTEF ENERGI AS) AND KERSTIN MARTENS (UBA)

NL - the project is focussing on energy related issues, but for the credibility of the labelling, it is important what consumer buy, especially in the food area.

UBA - the Nordic Ecolabel and the Good Environmental Choice include criteria for products sold, in Germany not, due to connected problems like sufficient quantity ecolabelled products, only food, or also non-food. The project will make a proposal and then it is up to the EUEB to decide.

Eurocommerce - what was the basis for deciding to develop the EU Ecolabel for supermarkets? What is the target audience, is it interesting for consumers? What is the link to the overall EU Ecolabel approach?

FR - why not use the ISO approach? The work is very advanced. In the light of the discussion this morning (on products on which the EU ecolabel should focus), was it assessed in this way?

EC - asked to what extend was the EMAS SRD for retailers used? Generally speaking, nothing has been decided at the moment, and supermarkets are not in the current work programme. It is a project under Horizon 2020. Once the project is finished, we will have a detailed discussion in the EUEB.

DK - agrees with the EC. Most of the project focuses on energy related issues in regards to construction and maintenance. Changing consumers purchasing decisions is not considered. That should be taken more into account.

BEUC/EEB - agrees with previous speakers.

NO - agrees with DK and asks why the project hasn't reached out sooner to the CBs?

SINTEF - replied that there has been an exchange with CBs in advance. There is huge potential for energy savings that are necessary to reach the climate goals agreed in Paris.

UBA - this Ecolabel should be interesting for consumers. Also, the retailers are interested, not just in Nordic countries and Germany, but other countries too. According to LCAs, the energy consumption is the key impact. Are aware of EMAS, but it is a very different approach. It was concluded that the project will further address the offered products.

President - Agreed to continue discussions in the November 2017 EUEB.

UPDATE ON COMMUNICATION ACTIVITIES (INCLUDING 25TH ANNIVERSARY) – DG ENVIRONMENT (EC)

BE – welcome the increased efforts of the EC to promote the EU Ecolabel. BE is planning a site visit of a new licence holder in the framework of the Green Week. Is also planning a workshop on detergents in June and in Q3/Q4 a promotional campaign targeting consumers.

FR - also increased communication activities: launched a press pack for the anniversary and tweets, have a joint event with AFNOR to present new criteria on tourist accommodation. Believe that a toolkit for retailers is not necessary – retailers just need the logo and key messages. FR launched a partnership with "Systeme U" and developing a partnership with Carrefour this year. Asked about the stickers for tourist accommodation. Asked to be consulted regarding the visual identity being developed by the EC contractor.

IT - noted it is hard to promote something whose life is so uncertain. Stakeholders are asking about the future of the scheme. We need to be credible. IT is organising events prior to the Green Week and will have material to give as a result. A workshop on tourist accommodation with the Emilia Romagna region is planned on the 23rd of May. Stressed the urgency of the User Manual for TAS, and its translation. On the 24th of May, IT will attend in Verona a fair on detergents and cleaning, where they will give a presentation on the EU Ecolabel and will launch the EU Ecolabel awards in the afternoon. Noted that large companies producing "tissue paper" are unwilling to join promotional efforts because they do not know what will happen with the PG.

DK - will keep a focus on their national consumer campaigns, are working with retailers. By contrast, they believe a toolkit is useful. Note that knowledge on the EU Ecolabel has increased (from 2016 to 2017 from 38% to 44%). Will use social media and B2B newsletter to promote the 25th anniversary and welcome any material from the EC.

EC - explained the idea behind the stickers for tourist accommodations (sticker with the EU Ecolabel logo, for the front doors/windows of accommodation buildings). The helpdesk is already working on the stickers. The User Manual for tourism will be ready in few days. Thanked for the efforts to engage in the various workshops. Requested articles with pictures or any other material of national-level EU Ecolabel events, so the EC can put them on the EU Ecolabel website News page.

BEUC/EEB - encouraged everyone to get involved in communication/promotional activities. Noted that a retailer was interested in a joint Europe-wide retail week that will attract more media attention. Encourage MS to join the cooperation. The 25th anniversary is a good opportunity this year. Offers national contacts to consumer organisations.

President – indicated that in the future, we should foresee more time in the EUEB agenda for the presentation of communication activities. 30 mn is not enough.

PRESENTATION OF THE PROPOSAL FOR AN AMENDMENT OF THE DECISION ON TELEVISIONS - JOINT RESEARCH CENTRE (EC)

NL - welcomes the proposed change. Was unsure how this amendment would affect current licence holders.

NO - welcomes the proposed change. Suggested that this was a perfect way to have a shortened procedure for revisions. Noted that the industry has to get a year to adapt to the new criteria.

BE - supports the NL and NO. Was reticent on the transition period. Asked what to do with the current licence holders? Should they withdraw their stock from the shelves after the amendment? Noted that amendments are not the right procedure for making things stricter but rather for correcting mistakes. Suggested to launch preparation of new criteria instead, with a shortened procedure for every criteria update as that would avoid uncertainties.

DK - supports expiration of the criteria, unless they are prolonged with this amendment. Noted that the criteria have been continuously prolonged and it is embarrassing not to update the very important criterion of energy performance. There should not be a problem with the licence holders and products that do not conform after the amendment as the actual criteria have been prolonged several times.

BEUC/EEB - supports the EC and the JRC proposal. As always, receive criticism that the EU Ecolabel is not a strong label. Agrees with DK to allow the expiration/prolongation. Asked if current licence holders would be interested in reapplying? Noted that the EU Ecolabel should not just be concerned about the numbers (of licences) but about the credibility of the scheme. Otherwise, environmental NGOs and consumers may not want to associate with it anymore.

FR – supports the JRCs proposal. Asked for a clarification about considering the Energy Label. Will the Ecodesign regulation be considered?

EC - replied that various options were considered but the amendment was considered as the most practical. Noted that the image of the EU Ecolabel is under pressure. Noted that there will be an adaptation period of 6 months which is sufficient in this case. Reminded that MS comments in a consultation round are to be received by April 5th. We are more in favour of a written vote. Regarding monitors and computer screens, a change of scope is needed for labeling and this will be done, but not via this amendment.

JRC - replied that they are consulting current licence holders and it is assumed that it will only affect a minor share of them. Industry is aware of this and will be consulted again. We have already presented a stricter version in September 2013. The criteria for monitors will be aligned in the revision with Ecodesign and Energy Star.

NO - noted that these product groups should have been revised in 2013. Noted that we can draw conclusions from this and that all product groups need to be kept in mind all the time.

We should avoid being tricked by the industry as we were with the timing prospects for LED screens.

PRESENTATION OF THE DID - LIST UPDATE PROJECT – REPRESENTATIVE OF NORWAY

NO – clarified that it would be useful to have a CAST number, but the industry may not authorise it. There would be a need to consult them. There is also an issue of workload.

BE – asked when the new DID list will start to be used.

NO – the list could start to be used for the new criteria.

Hildo Krop – Regarding ECHA data and data 'in stock', officially you are not allowed to use the ECHA data (companies have to buy the data in order to use it). How to data 'in stock' compare with ECHA data?

NL – asked to receive the new DID-list in order to share it with licence holders.

NO – the report with the list was sent to the EC in November. All data are new. Data from ECHA is being used. Industry has given permission to use the data.

EC – thanked NO for the presentation. Proposed that the list will be put online and the list will be used for new applicants, particularly for detergents, when the new criteria are published.

UPDATE ON THE REVISION OF LUBRICANTS - JOINT RESEARCH CENTRE (EC)

UK – believes that we should keep the focus of the PG on the existing scope. The evaluation of the need to enlarge the scope should take place, but should not be too long. Noted that one licence holder is keen to make investments in this area. Regarding hazardous substance criteria, there is an opportunity for the EUEB to interpret differently Articles 6.6 and 6.7. We don't have to follow the same line as with detergents. Suggested considering possible non-bio-based materials that could have a reduced environmental impact.

DK - would support the use of recycled material or reclaimed oil, but new material should be bio-based. It seems that for this PG, Art. 6.6 and 6.7 would be on product level and not on substance level. The presentation would be useful with a Commission explanatory note so we can take it for further consideration.

AT - Has the same comment as DK. We have a Task Force for the interpretation of ART. 6.6 and 6.7. Lubricants are mixtures of chemicals. Looking at the product level would not be a good thing.

FR - asked to define "engine oil". One stakeholder suggested a criterion on the origin of mineral raw materials. Regarding packaging, during the AHWG, JRC suggested launching a study on packaging, but FR believes it would be better to focus on hotspots like raw materials. Asked if the lubricants that come from shale oil/mineral oil origin are in scope.

Holdo Kropp - Regarding the hazardous substances, we do not want an EU Ecolabel with environmental classification and a health classification (2 logos next to each other). Regarding the scope, the EU Ecolabel is currently seen by the industry as a bio-based label. A combination of a requirement on bio-degradation and the use of bio-based material is related to circular economy.

BEUC/EEB – Recommend to exclude engine oil from the scope of the PG, and start developing a new PG. As regards the substance level, in the AHWG there was suggestion to use the Blue Angel approach (0.01%). The experts noted that it was really challenging. On renewable raw materials, we recommend no requirement on the content. Focus should be put on high bio-degradability and high aquatic toxicity. Have concern about the origin of the palm oil material (RSPO is not sufficient).

Refining Industry Association – understands the limitations and the scope of the PG, but would like to explore a separate PG for automotive, where re recycled products can be used in line with the Circular Economy narrative.

DE – explained that mineral base oils have exactly the same product as the re-refined oils, only the origin would differ, it is not necessary environmentally friendly.

EC – explained the timeline – the vote needs to be hold in June 2018. The EC is preparing a 2nd revised document. The current proposal is to keep the scope as it is currently. If we would like criteria for engine oils, it needs to be explored at further stage depending on the priorities of the EC and MS. *Hazardous substances* – explained that to have a strict interpretation 6.6 to substance level some flexibility will be needed, Blue Angel approach might be explored. This needs to be further explored and discussed. *Renewable raw material* – explained that this is a difficult issue to address, will do a research if we follow Blue Angel approach and focus on other aspects like biodegradability etc. or reformulate the wording so that it will be more flexible to different options. *Re-refined oils* – has to comply with biodegradability, toxicity and bioaccumulation requirements. Clarified to FR that when talking about Engine oils – 4 stroke car oils are meant. *Packaging* – couldn't confirm that this criterion will be kept.

DE - explained to the FR concerns that shale oil and mineral oil is impossible to distinguish, due to re-refining process.

Hildo Krop - origin of mineral oil part – shale oil is one of the concerns as they sometimes come from oils from Nigeria, Mexico etc. Gave the opinion that if only putting the origin of bio based fraction and excluding the origin doesn't sound sustainable.

President - suggests that this needs to be discussed at working group level. Asked the EC to elaborate on the scope.

EC – explained that a proposal has been made to keep the existing scope for this PG, as there is good uptake and good identity. Due to time constrains, the EC propose to keep the existing scope, but bearing in mind possible other products like engine oil, if there is a confirmed demand for it.

President - confirmed there is agreement on this.

UPDATE ON THE REVISION OF THE COPY & GRAPHIC PAPER PRODUCT GROUP –
JOINT RESEARCH CENTRE (EC)

NO - the energy criterion ambition level is not high enough. The EU Ecolabel should be at least as strict as the Nordic Ecolabel, bearing in mind that soon the criteria will be revised, as they expire in June 2019.

BEUC/EEB - participated at sub-group phone call last week. There, SE made the same comment than NO. The criterion can also be fulfilled in other production sites in the EU. The new data gathered in the Nordic Ecolabel revision should be considered for the EU Ecolabel too.

DE - on JRCs question regarding energy use and CO2 criteria, noted that best solution would be to keep both. If it is not possible, then it is better keep energy use.

BEUC/EEB - believed that the opinion of the sub-group participants was that we should combine both criteria, with the option to choose one. Energy efficiency is the most important, and it must remain mandatory. Expressed concern that recycled pulp is "punished" if CO2 values are set for each single kind of pulp.

PT - preferred to have energy and CO2 as an option to choose from. Option 1 and 2 are acceptable, but not option 3.

JRC – asked what is the EUEBs opinion on sustainable fibre requirement?

DK - supports both approaches presented by JRC.

UK - recalls the discussion in 2009/2010 where the UK was in favour - and still is - of minimum recycled fibre content. Especially in light of the circular economy, it is important to increase the market demand and to encourage life cycle thinking. Is interested in a more detailed explanation from JRC on the environmental aspects.

CEPI - responded to UK on the environmental impact due to transportation of recycled fibre. The market demand exceeds the availability. The key is better collection systems.

SE - agreed with DK and CEPI.

BEUC/EEB - regrets that there is no minimum recycled fibre requirement, asks JRC to include some sort of benefit for recycled fibre. Recycled fibre actually is exported to China, where practise is not sustainable. Does the EUEB agree on the already agreed wording on sustainable sourcing?

NO - Agrees with CEPI and other Nordic CBs on recycled fibre. There is a shortage of recycled fibre and even if it is due to export, there are many issues to consider.

JRC – As regards export to China, they are using much of it for packaging, that is different quality of pulp than for copying and graphic paper. Could consider benefits for recycled fibre apart from a minimum requirement. There could be benefits for example in regards to the

energy criterion. Regarding the wording for sustainable sourcing, JRC proposes to keep the recently agreed wording.

BEUC/EEB - notes that BAT values will be mandatory in 2018, not ambitious if there is a combined value, also the ambition level for the production of fibres. The objective of a revision should not be to keep all the old licence holders. Progress is needed.

JRC - replied that the proposal is targeting 30% of the European market. Each parameter is obligatory. The impact needs to be considered jointly. We are proposing 20% stricter than mandatory values. The industry needs time to adjust, due to the required investment. Asked for comments until beginning of April. An update will be made in the June EUEB if necessary. 2nd AHWG meeting is planned for end September/beginning October. Planned to finalise report in January 2018 and have the new adopted criteria by June 2018.

PRESENTATION OF THE RESULTS OF THE STRATEGIC TASK FORCE ON UPTAKE – JOINT RESEARCH CENTRE (EC)

NO – thanked for the presentation. We need more such evaluations in the future. Noted the need for such evaluations before prolongations/revisions. Decisions on PG should be informed decisions.

EC - noted the limited resources of the JRC, the EC proposed to focus the work. The JRC should not invest resources on assessing PGs that are obviously successful. There, the EUEB should be able to take a fast decision to revise/amend.

FR – agrees with the EC proposal. Recommend that work should start with industry's interest. PG with good uptake should automatically remain on the scheme. Asked for clarification on the status of paper PGs.

UK - noted the need for a more integrated approach between product groups. Work should be integrated into preliminary reports and have a sort of assessment checklist. When the PG is successful, we should move on.

BE – currently, we are looking on PG case by case. Suggested that the Task Force could be a place for assessment of new PGs? Analysing successful PGs could help understand how new candidates could be successful. The Task Force should look on a larger scale on our successes and failures.

EC - noted that the JRC is assessing the imaging equipment PG inside work to be part of GPP – we will discuss findings at the EUEB in June. Noted that for JRC there is a question of capacity. The Task Force is currently 1 person, not even full time. The scope of the Task Force was already enlarged. For PGs for the future, we need a strategy. We should have such discussion separately. We can still learn from the Task Force experience.

DE - did not support doing an uptake study before the prolongation study, suggested to integrate rather into the preliminary report.

JRC – confirmed the above position. For the moment, we should not enlarge the scope of work of the Task Force.

BEUC/EEB – The Task Force is doing solid research on PGs. For converted paper, it was demonstrated that there is clear interest from the industry, but we don't have certainty that this PG will continue. Opinion of the EUEB needs to be taken into consideration for deciding on PGs.

EC – What is the opinion of the EUEB on the proposal to exclude from the list of PG to be assessed by the Task Force those which are obviously successful? The EC referred to an expression of interest from CEPE on the paints and varnished PG.

President - suggested that unsuccessful PGs shall be dealt within the Task Force and the final decision is to be made in EUEB. The successful ones like paints and varnishes, the Task Force will not make an assessment and a decision will be taken separately.

JRC –the Task Force was set up for unsuccessful PGs. For successful PGs, when it is decided to continue them, there will in any case be in the preliminary report an analysis on why is the PG successful.

UK – asked about the status of newsprint paper and tissue paper.

President - highlighted that there is a real need for EUEB to know what is going on with the PGs that have been discussed at political level, as some of them expire in May. The question is formally asked to the EC, that the EUEB should be informed on the status of PGs such as newsprint paper and tissue paper.

AOB AND CLOSING – PRESIDENT

SE – warmly thanked the EUEB for good years of cooperation. The SE representative is now moving to a new position.

4. Conclusions/recommendations/opinions

EC – regarding the dates suggested for EUEB meetings in 2018, the EC needs EUEB members' feedback as soon as possible in case some dates are causing problem. The EC also stressed the importance of having MSs' cooperation for the upcoming promotional events such as the Green Week event on 31/5.

The President - closed the EUEB.

5. Next steps/meeting

The next EUEB will take place in Brussels on 21 and 22 June 2017.