



STUDY FOR THE

Revision and development of EU Ecolabel criteria for the footwear product group

(Commission Decision 2002/231/CE of 18 March 2002 establishing revised ecological criteria for the award of the Community eco-label to footwear and amending Decision 1999/179/EC)

*1st Ad Hoc Working Group Meeting
Brussels, 12 March 2008*

Service Contract N. 070307/2007/482665/MAR/G2



INTRODUCTION

The 17 Dec 2007

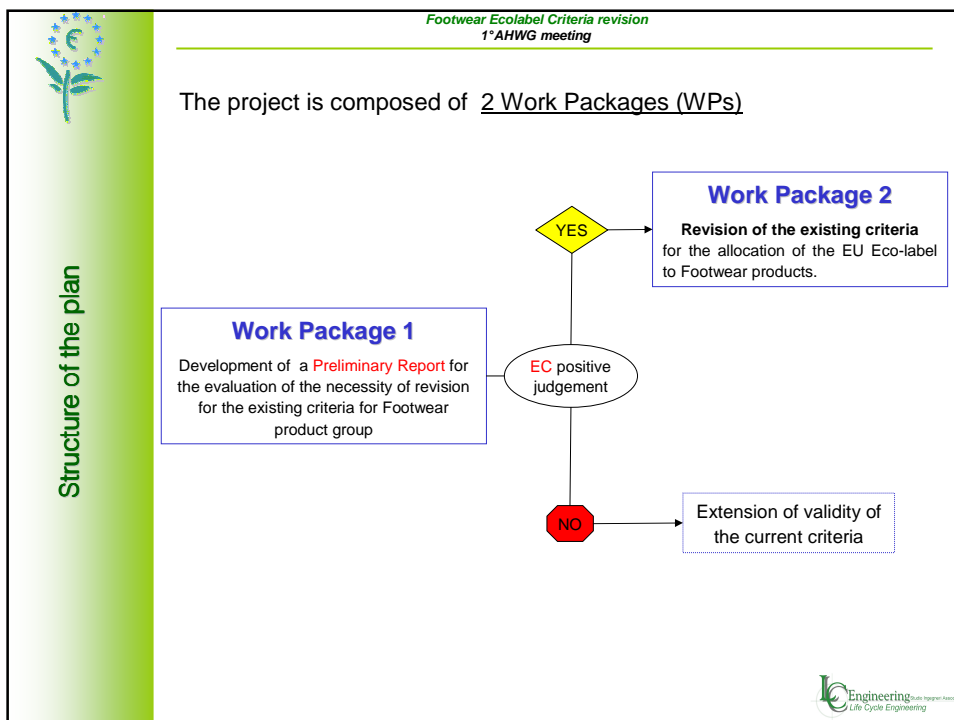
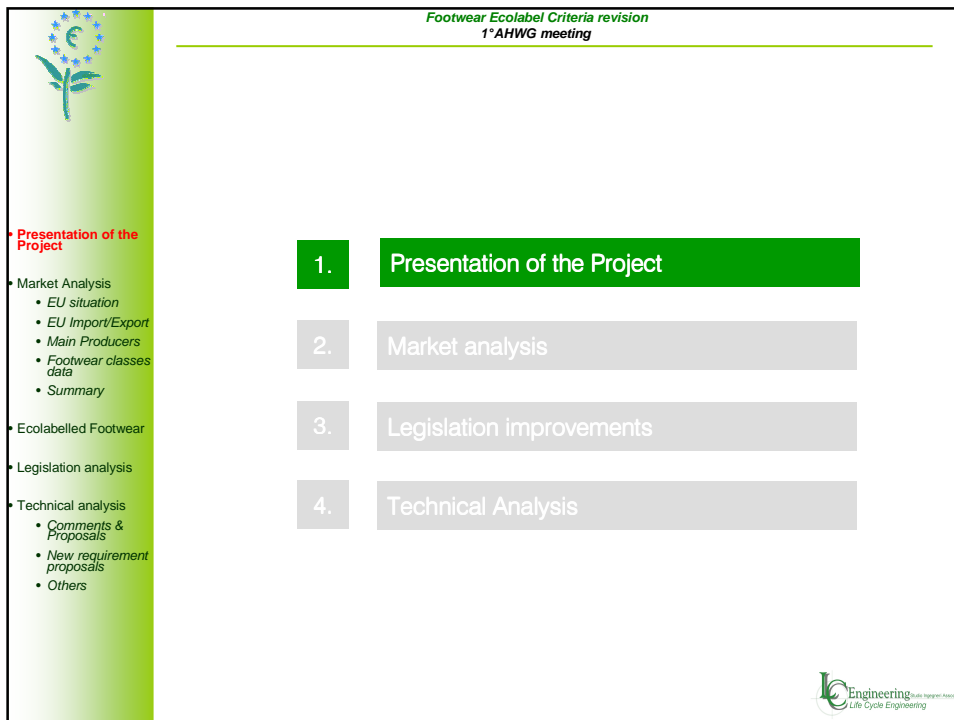
Life Cycle Engineering has been entrusted by the European Commission for the development of the project entitled:

Revision and development of EU Ecolabel criteria for the footwear product group

The aim of the project is to consider the need for updating and developing new criteria for the Footwear product group.

The total duration of the project shall not exceed 24 months.







This **presentation** reports the project situation **at the beginning of March 2008** when the first draft of the Preliminary Report was distributed to all interested parts

(any reference to the Preliminary Report text is done by 'PR' indication)

Any contributions received after 26 February 2008 will be considered for the future steps of the project



Working Package 1 is divided into 3 tasks:

Task 1
(June 2008)



- Drawing up of a **Preliminary Report** that will constitute the informative platform for the whole project.
- Ad Hoc Working Group (AHWG) identification;
- Preparation of the 1st AHWG meeting.

Task 2
(July 2008)



- Management of comments on Preliminary draft report;
- Distribution to all interested parts of the **WP1 Final Report**

Task 3
(September 2008)



- Preparation of the **1st EUEB meeting**:

Note: initially the 1° AHWG meeting was planned in the task 2. Further it has been decided to anticipate it in the task 1. From the comments and the suggestions raise in this meeting it can emerges the possibility of prepare a 2° meeting in this task.



Working Package 1 activities: up to date situation (Table 1.1 in the PR)

TASK	ACTION	DEADLINE	DELIVERABLES	STATUS
	DEFINITION OF THE WP1 WORK PLAN	17 DECEMBER 2007	WP1 TIMETABLE	Ok
	DEFINITION OF A FIRST GROUP OF STAKEHOLDERS (SUCH AS ECO-LABELLED COMPANIES AND ACCREDITED LABORATORIES)	04 JANUARY 2008	-	Ok
	SCHEDULING OF THE 1 st AHWG MEETING (TO COLLECT INFORMATION AND RAISE INTEREST)	07 JANUARY 2008	-	Ok
	UPDATED MAILING LIST OF EU INTEREST PARTIES	07 JANUARY 2008	MAILING LIST	Ok
	DRAWING UP AND DELIVERY OF A QUESTIONNAIRE TO REQUIRE COMMENTS ON EXISTING CRITERIA TO LABELLED COMPANIES AND ACCREDITED LABORATORIES	13 JANUARY 2008	PRELIMINARY QUESTIONNAIRE	Ok
	FEEDBACKS FROM THE PRELIMINARY QUESTIONNAIRES DEADLINE	16 FEBRUARY 2008	FILLED QUESTIONNAIRES SENT BACK TO THE STAKEHOLDERS	Ok
	UPDATED MARKET ANALYSIS, REGULATORY REVIEW (INCLUDING LEGISLATIVE INITIATIVES) FOR FOOTWEAR MANUFACTURING	28 FEBRUARY 2008	UPDATED MARKET DATA FOR FOOTWEAR	Ok
	PRELIMINARY DRAFT REPORT (UPDATED MARKET DATA FOR FOOTWEAR; CRITICITY EMERGING FROM QUESTIONNAIRES)	28 FEBRUARY 2008	PRELIMINARY DRAFT REPORT	Ok
TASK 1	DOCUMENTS FOR THE 1 st AHWG MEETING	28 FEBRUARY 2008	PRELIMINARY DRAFT REPORT	Ok
	1 st AHWG MEETING	12 MARCH 2008	PRELIMINARY DRAFT REPORT, PPT PRESENTATION	IN PROGRESS
	MINUTES OF THE 1 st AHWG MEETING	26 MARCH 2008	MINUTES	NEXT
	MANAGEMENT OF THE AHWG COMMENTS	26 MARCH 2008	UPDATED PRELIMINARY DRAFT REPORT	NEXT
	DRAWING UP AND DELIVERY OF A SECOND MORE DETAILED QUESTIONNAIRE TO STAKEHOLDER	2 APRIL 2008	HEADED QUESTIONNAIRE	NEXT
	FEEDBACKS FROM THE SECOND QUESTIONNAIRES DEADLINE	2 MAY 2008	FILLED QUESTIONNAIRES SENT BACK TO THE STAKEHOLDERS	NEXT
	PRELIMINARY DRAFT REPORT ON THE WP1 ACTIVITIES DIFFUSION TO EC (LCA APPROACH TO HIGHLIGHT HOT SPOTS, ANALYSIS ON MARKET POTENTIALS AND ENVIRONMENTAL BENEFITS FOR ECO-LABELLED PRODUCTS)	20 JUNE 2008	PRELIMINARY DRAFT REPORT	NEXT
	COMMENTS FROM EC	27 JUNE 2008	-	NEXT
TASK 2	MANAGEMENT OF EC COMMENTS ON PRELIMINARY DRAFT REPORT AND DISTRIBUTION TO ALL INTERESTED PARTIES	8 JULY 2008	-	NEXT
TASK 3	ORGANIZATION OF THE EUEB MEETING FOR WP1	JULY	-	NEXT
	DOCUMENTS FOR THE EUEB MEETING	SEPTEMBER	WP1 FINAL REPORT	NEXT



Aims of the Preliminary Report

- To present some basic market data to make a picture of the sector (*Analysis of the EU flower share*);
- To define the available technologies and production methods;
- To analyse the existing EU and some specific national legislations as well as BAT and BREF documents for Footwear (if existing) ;
- To evaluate the necessity of the revision of EU Eco-label current criteria for the product group Footwear (*explanation and discussions on the comments and proposals provided by the interested parts*).



Contents of the Preliminary Report (update 28/02/2008)

The Report is currently structured into 3 main sections:

1. Information about EU Hard Floor Coverings Market

(the data collected considers the EU-25 Member States and the EU market relevance compared with global trends or other non-EU countries statistics);

2. A European legislation analysis

(investigating regulatory improvements for the footwear sector);

3. A Technical analysis of existing criteria

(it focuses on the eventual footwear production processes development and contains some proposals for the criteria revision suggested by some associations and other stakeholders);

Note: this unit represents the main core of the report and will be in progress until the end of the WP1



This 1st AHWG meeting for the footwear product group has been anticipated at the 4th month from the start of the project, with the aim of making a 'state of art' of the situation and to receive comments and suggestions of all the interested parties.

Aims of the meeting

Presentation of the Preliminary Report "Footwear" (28/02/2008):


- preliminary market analysis results;
- firsts comments and proposals on the current Criteria (Decision 2002/231/EC) received from Questionnaires.

Discussion on the existing Footwear criteria:

- comments from participants;
- discussion on the possible introduction of a requirement for the CO₂ emission from product life cycle.


Conclusions on criteria to be revised and time table for next actions

*Footwear Ecolabel Criteria revision
1st AHWG meeting*




- Presentation of the Project
- **Market Analysis**
 - EU situation
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 - Main Producers
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- Technical analysis
 - Comments & Proposals
 - New requirement proposals
 - Others

1.	Presentation of the Project
2.	Market analysis
3.	Legislation improvements
4.	Technical Analysis



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1st AHWG meeting*



- Presentation of the Project
- **Market Analysis**
 - EU situation
 - EU Import/Export
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HOT SPOTS

The market analysis:

- considers the EU-25 Member States data (*year 2006, despite other indication in the text*)
- analyzes the EU market relevance compared with global trends;
- analyzes the EU internal market situation.

Main references:

- EUROSTAT - Prod COM, "Statistics on the production of manufactured goods". ANNUALS from 2003 until 2006;
- ANCI, 2006 - "L'industria calzaturiera italiana nel 2006 – Relazione economico statistica", A.N.C.I. (2006);
- European Commission Enterprise and Industry (<http://www.ec.europa.eu/enterprise/footwear/statistics.htm>)



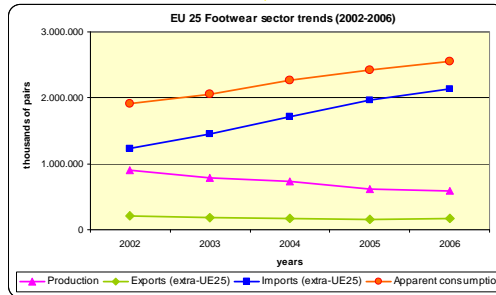


EUROPEAN PRODUCTION, CONSUMPTION AND EXTERNAL TRADE

(thousands of pairs)

EU25 production, consumption and external trade (EUROSTAT, 2006) – (Table 2.1 in the PR)

(Data expressed in 1000 pairs)	2002	2003	2004	2005	2006	Var. % 2002- 2006
Production	900.535	780.811	728.211	614.097	587.088	-35
Exports (extra-UE25)	214.348	181.276	170.085	163.579	172.713	-19
Imports (extra-UE25)	1.232.914	1.455.036	1.709.875	1.969.532	2.140.075	+74
Apparent consumption [(product. + imports) – exports]	1.919.101	2.054.571	2.268.001	2.420.050	2.554.450	+33



European production, consumption and external trade trends
(Figure 2.1 in the PR)

Note

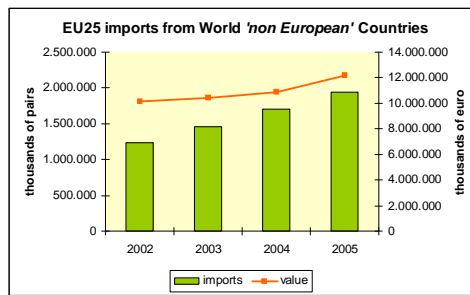
Figure 2.2 in the PR (based on Eurostat Prod COM data) shows an increasing of the sold trade value in €, despite to a decreasing of the production volume.



- Presentation of the Project
- **Market Analysis**
 - **EU situation**
 - EU Import/Export
 - Main Producers
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- Technical analysis
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EU25 IMPORT - EXPORT



2002-2005 EU25 imports: n° of pairs and value (Source: ANCI, 2006)
(Figure 2.3 in the PR)

2005	Imports (1000 pairs)	Share of imports	Var. % 2002-2005	Imports (1000 €)	Share of imports	Var. % 2002-2005
World	1.939.813	100,0	57,3	12.173.661	100,0	20,2
China	1.250.802	64,5	171,1	4.796.808	39,4	109,8
Vietnam	265.271	13,7	-6,6	2.076.354	17,1	-1,6
Romania	71.467	3,7	7,5	1.378.316	11,3	2,7
India	52.629	2,7	45,9	702.993	5,8	16,6

2005 Top 4 EU-25 suppliers: n° of pairs and value (Source: ANCI, 2006)
(Tables 2.2 and 2.3 in the PR)

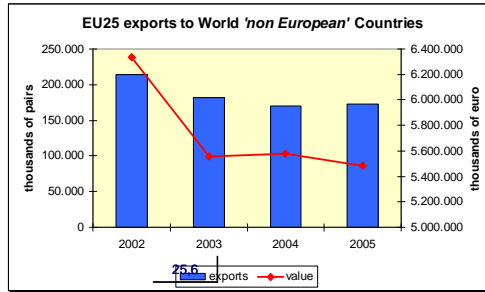


- Presentation of the Project
- **Market Analysis**
 - EU situation
 - **EU Import/Export**
 - Main Producers
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- Technical analysis
 - Comments & Proposals
 - New requirement proposals
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EU25 IMPORT - EXPORT



2002-2005 EU25 exports : n° of pairs and value (Source : ANCI, 2006)
(Figure 2.4 in the PR)

2005	Exports (1000 pairs)	Share of exports	Var. % 2002-2005
World	172.713	100,0	5,4
USA	41.805	25,6	-43,1
Switzerland	20.447	12,5	-10,44
Russia	12.190	7,5	3,8
Norway	8.534	5,2	6,3

2005 Top 4 EU-25 markets : n° of pairs
(Source: ANCI, 2006)
(Tables 2.4 in the PR)

2005	Exports (1000 pairs)	Share of exports	Var. % 2002-2005
World	5.486.042	100,0	-13,4
USA	1.356.756	24,7	-32,2
Switzerland	597.323	10,9	-2,6
Romania	561.093	10,2	14,8
Russia	530.783	9,7	10,8

2005 Top 4 EU-25 markets : value (€)
(Source: ANCI, 2006)
(Tables 2.5 in the PR)

Presentation of the Project

Market Analysis

- EU situation
- **EU Import/Export**
- Main Producers
- Footwear classes data
- Summary

Ecolabelled Footwear

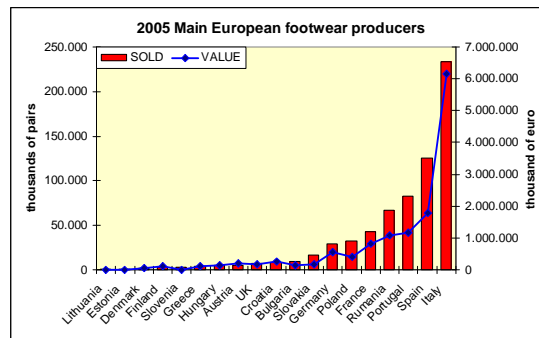
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2006 EUROPEAN FOOTWEAR MARKET OVERVIEW



2005 main European footwear producers by n° of pairs and economic value (EUROSTAT, 2006) (Figure 2.7 in the PR)

Main 5 European (EU and non EU) Producers in 2005:

Country	pairs x1000	€ x1000
Italy	232.954	6.149.595
Spain	126.000	1.775.269
Portugal	83.000	1.170.379
Rumania	66.655	1.096.397
France	42.756	829.971



Presentation of the Project

Market Analysis

- EU situation
- EU Import/Export
- **Main Producers**
- Footwear classes data
- Summary

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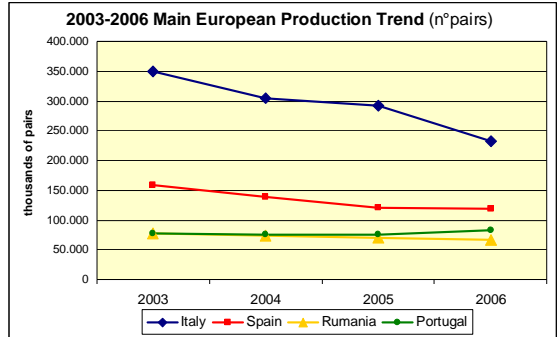
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- Others



Main European Manufacturer production trend (2003 – 2006)



Italy, Spain, Rumania, Portugal trend production between 2003-2006
(Source: EUROSTAT, 2006) (Figure 2.8 in the PR)

As for the European trend, also the production of the most important European producers shows a less or more marked decrease.

Italy is the Country more affected by the sector crisis.



- Presentation of the Project
- **Market Analysis**
 - EU situation
 - EU Import/Export
 - **Main Producers**
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- Technical analysis
 - Comments & Proposals
 - New requirement proposals
 - Others



Footwear Classes

(Elaborated to Eurostat Prod COM categories)

Category "Use"

(including different use classes to highlight main footwear market's demands)

INDOOR FOOTWEAR		Slippers and other indoor footwear, including bedroom and dancing slippers, mules.
TOWN FOOTWEAR		Men, women and children footwear, including boots and shoes, daily used for common purposes.
SPORTS FOOTWEAR		Tennis shoes, basketball shoes, gym shoes, training shoes, ski boots, cross-country ski footwear, snowboard boots.
SAFETY FOOTWEAR		Shoes with protective metal toe-cap used for working purposes.

Footwear Use classes (data elaborated by LCE)
(Table 2.6 in the PR)

Category "Materials"

(category based on the main materials used in the footwear manufacture. Only the main component materials have been considered)

LEATHER		Men, women, children sandals with leather (and cork, wood) materials.
TEXTILE		Shoes with textile composition in particular for uppers components.
RUBBER & PLASTICS		Shoes rubber or plastic outer soles and uppers (e.g. waterproof shoes)

Footwear Materials classes (data elaborated by LCE)
(Table 2.7 in the PR)



- Presentation of the Project
- **Market Analysis**
 - EU situation
 - EU Import/Export
 - Main Producers
 - **Footwear classes data**
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- Technical analysis
 - Comments & Proposals
 - New requirement proposals
 - Others

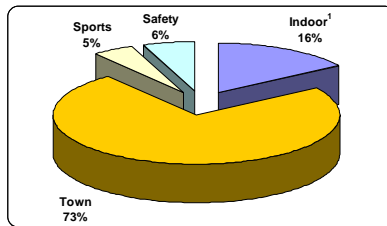


Footwear Classes

(Elaborated to Eurostat Prod COM categories)

Category "Use"

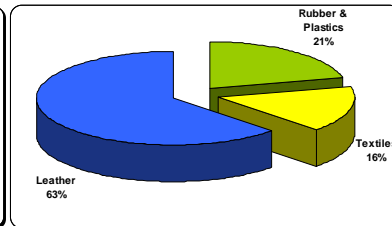
(including different use classes to highlight main footwear market's demands)



Footwear manufacture breakdown by use in terms of sold products (data elaborated by LCE)
(Figure 2.5 in the PR)

Category "Materials"

(category based on the main materials used in the footwear manufacture. Only the main component materials have been considered)



Footwear manufacture breakdown by materials in terms of sold products (data elaborated by LCE)
(Figure 2.6 in the PR)

- Presentation of the Project
- **Market Analysis**
 - EU situation
 - EU Import/Export
 - Main Producers
 - **Footwear classes data**
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- Technical analysis
 - Comments & Proposals
 - New requirement proposals
 - Others



SUMMARY OF THE MARKET ANALYSIS

Below is presented the market data situation in Europe for the different classes individuated.

Note: it has to be highlighted that for the 'Materials' category only the percentage values are reported, because of some overlaps in the code use, due to the mixed composition of some kind of shoes: a precise value would have not meaning.

Summary of the Footwear European market by use and by main materials (elaborated by LCE)
(Tables 2.8 and 2.9 in the PR)

EUROPEAN FOOTWEAR PRODUCTION 2006					
USE	Category	TOTAL PRODUCTION (unit: 1000 pairs)		TOTAL VALUE (unit: 1000 €)	
				%	
	Town	353.568	73%	9.599.277	80%
	Sports	50.404	6%	662.114	10%
	Safety	28.069	6%	692.086	6%
	Indoor	76.780	16%	425.507	4%
	Total	587.000	100	11.378.984	100

MATERIALS	Category	TOTAL PRODUCTION %	TOTAL VALUE %
	Leather	63%	80%
	Textile	16%	8%
Rubber & Plastics	21%	12%	

- Presentation of the Project
- **Market Analysis**
 - EU situation
 - EU Import/Export
 - Main Producers
 - Footwear classes data
 - **Summary**
- Ecolabelled Footwear
- Legislation analysis
- Technical analysis
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Currently nine manufacturers have obtained the label

Ecolabelled footwear products (source: EU Ecolabel Catalogue, 2008; for Italian manufacturer: APAT)
(Table 2.10 in the PR)

Company	Country	Products
OVER TEAK	Italy	Safety shoes
GAZZONI ECOLOGIA	Italy	Town footwear
3A Antonini	Italy	Town footwear
INDUSTRIE CALZATURE	Italy	Safety shoes
TACCONI	Italy	Safety shoes
CALZAT. FRATELLI SOLDINI	Italy	Town and safety footwear
CALZATURIFICIO RELAX	Italy	Indoor footwear, slippers and sandal
SKOFABRIKEN KAVAT AB	Sweden	Child's shoes
PIKOLINOS INTERCONTINENTAL SA	Spain	Town footwear

Considerations:

- Seven of the nine awarded manufacturers are from **Italy**;
 - Only **sport footwear** class of use is not represented almost by one award;
- Some producers have recently rejected the award because of the inconsistency of the advantages due to the EU ecological Flower;
- From a preliminary benchmarking analysis it emerged that just EU established the ecological criteria for the footwear product group: no other European or National ecological brand are known.



It emerges the necessity of promoting in a most important way the EU flower for footwear.



- Presentation of the Project
- Market Analysis
 - EU situation
 - EU Import/Export
 - Main Producers
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- Technical analysis
 - Comments & Proposals
 - New requirement proposals
 - Others

1. Presentation of the Project
2. Market analysis
3. Legislation improvements
4. Technical Analysis





Test methods references update

Normative references



The **revised criteria** shall cite in the “*Assessment and verification*” section, reference to the norm **EN 14602** or to the correspondent specific CEN/ISO standard.

- Presentation of the Project
- Market Analysis
 - EU situation
 - EU Import/Export
 - Main Producers
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- **Legislation analysis**
- Technical analysis
 - Comments & Proposals
 - New requirement proposals
 - Others

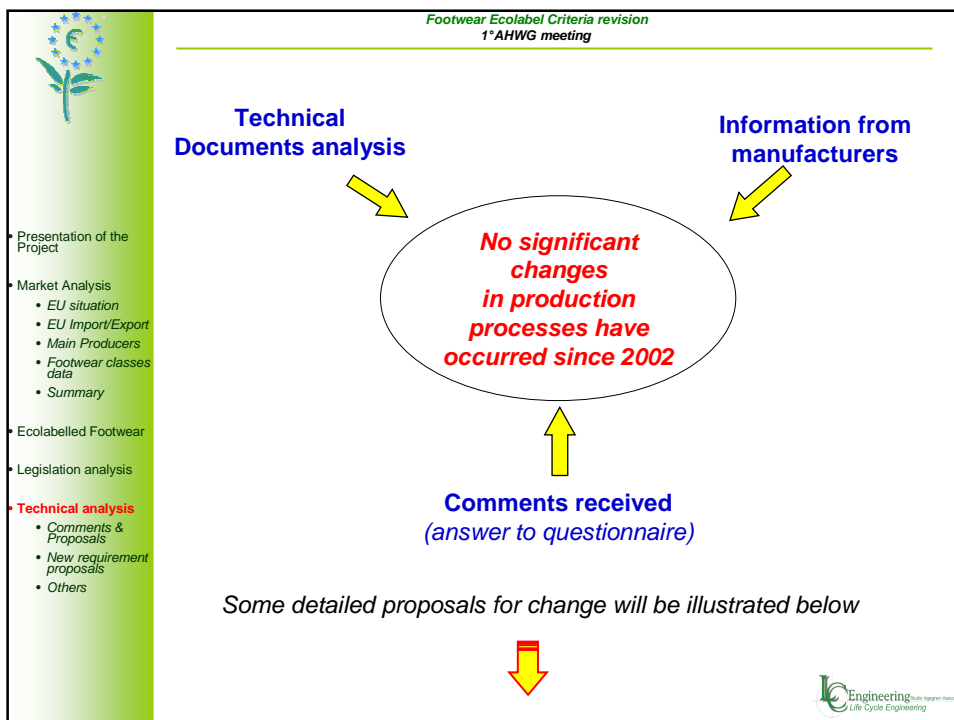
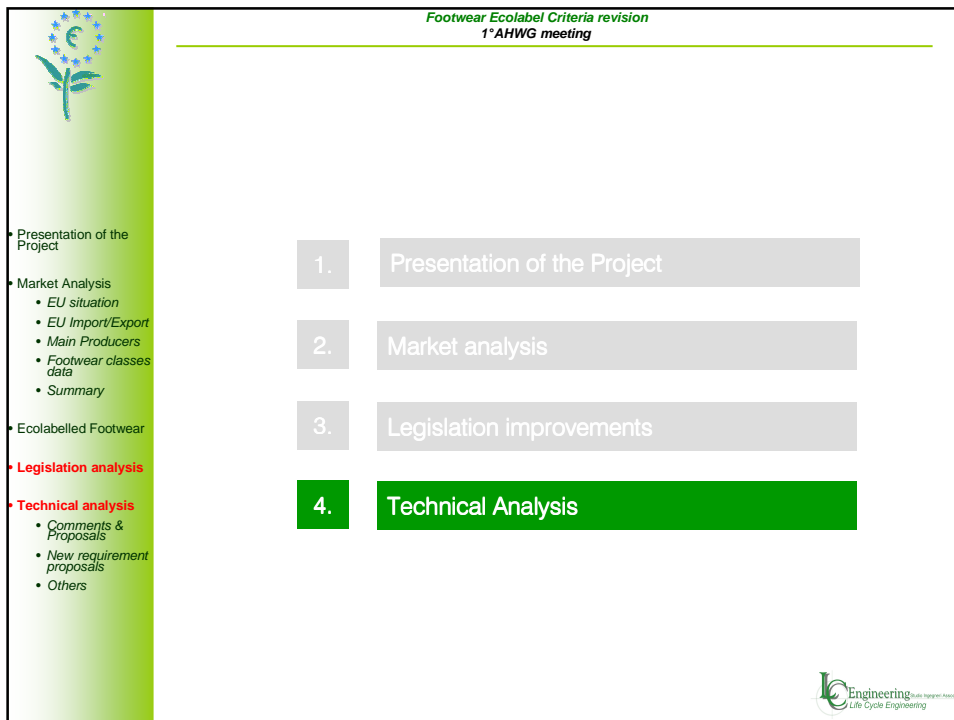


The updated set of test methods for criteria proposal (Table 1.1 in the PR)

Criterion	Parameter	Current Test Method Dec. 2002/231/EC	Updated Test Method proposal (CEN/ISO)
1 Residues in the final product	Cr(VI)	- CEN TC 309 WI 065 - 4.2 - DS/EN 420 - DIN 53314: 1996-04	EN 14602 – 5.1
	Cd, Pb, As	- CEN TC 309 WI 065 - 4.3	EN 14602 – 5.2
	Formaldehyde	- Textiles: CEN TC 309 WI 065 - 4.4 - Leather: CEN TC 309 WI 065 - 4.4	EN 14602 – 5.3 ISO/TS 17226 EN 14602 – 5.3 EN ISO 14184-1
2 Emissions from the production of material	COD (leather)	- ISO 6060	ISO 6060
	Chromium (III)/I	- ISO 9174 - EN 1233 - EN ISO 11885	ISO 9174 EN 1233 EN ISO 11885
3 Use of harmful substances (up until purchase)	PCP / TCP	- CEN TC 309 WI 065 – 4.5	EN 14602 – 5.4
	Azo dyes	- CEN TC 309 WI 065 – 4.5	EN 14602 – 5.5
	N-Nitrosamines	- EN 12868 (1999-12)	EN 14602 – 5.6
4 Use of volatile organic compounds (VOCs) during final assembly of shoes	Chloralkanes	None	EN 14602 – 5.7
	VOCs	- CEN TC 309 WI 065 – 4.7	EN 14602 – 5.8
5 Use of PVC	Phthalates	None	EN 14602 – 5.9
6 Energy consumption	Calculation	None	EN 14602 – 5.12
11 Parameters contributing to durability	Durability for all type (except “safety shoes”)	- CEN TC 309 WI 065 – 4.9.	EN 14602 – 5.13

- Presentation of the Project
- Market Analysis
 - EU situation
 - EU Import/Export
 - Main Producers
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- **Legislation analysis**
- Technical analysis
 - Comments & Proposals
 - New requirement proposals
 - Others







Main environmental aspects linked to Footwear

The main environmental aspects involved in the production process of footwear are:

Environmental Aspects linked to the Footwear production stages (Table 4.1 in the PR)

Environmental Aspects	Life Cycle Stage
Use of harmful substances (for the environment and health)	Raw materials/Production
Water pollution	Production
Emissions of Volatile Organic Compounds (VOCs)	Production
Energy consumption	Production
Residues of metals and formaldehyde	Final product
Packaging materials	Final product
Durability	Use

- Presentation of the Project
- Market Analysis
 - EU situation
 - EU Import/Export
 - Main Producers
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- **Technical analysis**
 - Comments & Proposals
 - New requirement proposals
 - Others



Framework (Assessment and verification requirements)

Theme	Existing requirements	New requirements proposal	Motivation
1. Assessment and verification requirements	Currently there are taken into account some environmental management schemes, such as EMAS or ISO14001, when assessing applications and monitoring compliance with the criteria	The EPD scheme has to be considered in addition to EMAS and ISO14001. The requirement should be modified as follows:. "The competent bodies are recommended to take into account the implementation of recognised environmental management schemes, such as EMAS, ISO14001 and EPD, when assessing applications and monitoring compliance with the criteria"	Companies that comply with the EDP System are facilitated to furnish data for the Ecolabel award
2. Applicability of the criteria	None	To exclude from the criteria the less important components (in % or in weight)	To facilitate the award


- Presentation of the Project
- Market Analysis
 - EU situation
 - EU Import/Export
 - Main Producers
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- **Technical analysis**
 - Comments & Proposals
 - New requirement proposals
 - Others




*Footwear Ecolabel Criteria revision
1*AHWG meeting*

Criterion 1. - Residues in the final product

Theme	Existing requirements	New requirements proposal	Motivation
1. Chromium (VI), Arsenic, Cadmium, Lead	Avg concentration of residues of Chromium (VI) in the final product = 10 ppm; No residues of Arsenic, Cadmium and Lead in the final product	To not apply the criterion in case it is proved that the materials contains no heavy metals	To facilitate the applicant
2. Formaldehyde	Textile components = 75 ppm; Leather components = 150 ppm	To lower the limits (30 ppm is proposed)	To preserve health safety




- Presentation of the Project
- Market Analysis
 - EU situation
 - EU Import/Export
 - Main Producers
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- **Technical analysis**
 - **Comments & Proposals**
 - New requirement proposals
 - Others




*Footwear Ecolabel Criteria revision
1*AHWG meeting*

Criterion 2. - Emissions from the production of material

Theme	Existing requirements	New requirements proposal	Motivation
1. Waste Water - COD emissions	Reduction of the COD content in the waste water = 85 %.	To exclude the synthetic fibres form the requirement.	COD requirement is not relevant
2. Waste Water - Chromium (III)/I emissions	5 mg Chromium (III)/I	To introduce a COD hurdle value instead of a reduction in percent	Easiest to apply and technically more correct
3. Waste Water - Chromium (III)/I emissions	5 mg Chromium (III)/I	To lower the limit	To preserve health safety and environment



- Presentation of the Project
- Market Analysis
 - EU situation
 - EU Import/Export
 - Main Producers
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- **Technical analysis**
 - **Comments & Proposals**
 - New requirement proposals
 - Others





Criterion 3. - Use of harmful substances (up until purchase)

The existing criterion states:

a) *Pentachlorophenol (PCP) and Tetrachlorophenol (TCP) and its salts and esters shall not be used.*
-for the list of substances, please, refer to the Commission Decision 2002/231/EC.

(b) *No azo dyes shall be used that may cleave to any of the following aromatic amines:*
-for the list of substances, please, refer to the Commission Decision 2002/231/EC.

Textiles: limit 30 ppm. (note: false positives are possible for 4-aminoazobenzene and confirmation is therefore recommended);

Leather: limit 30 ppm. (note: false positives are possible for 4-aminoazobenzene, 4-aminodiphenyl and 2-naphthylamine and confirmation is therefore recommended).

(c) *The following N-Nitrosamines shall not be detected in rubber.*

-for the list of substances, please, refer to the Commission Decision 2002/231/EC.

(d) *C10-C13 chloralkanes shall not be used in leather, rubber or textile components.*

[No comments on these criteria have been received.](#)

New knowledge about *nitrosamines* and *chloroalkanes* are being investigated.



- Presentation of the Project
- Market Analysis
 - EU situation
 - EU Import/Export
 - Main Producers
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- **Technical analysis**
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Criterion 4. - Use of volatile organic compounds (VOCs) during final assembly of shoes

Theme	Existing requirements	New requirements proposal	Motivation
1. VOC limitation	Casual, women's town = 25 gram VOC/pair; Fashion, infants, indoor = 20 gram VOC/pair	To lower the limits	To preserve health safety and environment. The in force limits are the same imposed by the European legislation (Directive 1999/13/CE)



- Presentation of the Project
- Market Analysis
 - EU situation
 - EU Import/Export
 - Main Producers
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- **Technical analysis**
 - **Comments & Proposals**
 - New requirement proposals
 - Others



Criterion 5. – Use of PVC

The existing criterion states that:

“The footwear shall not contain PVC. Recycled PVC may, however, be used in outsoles, where no use is made of DEHP (bis(2-ethylhexyl)phthalate), BBP (butylbenzylphthalate) or DBP dibutylphthalate) in preparing the recycled PVC.”

Since the PVC can be effectively recycled, the proposal is to change the criterion in:
“The footwear outsoles may content recycled PVC where no use is made of DEHP (bis(2-ethylhexyl)phthalate), BBP (butylbenzylphthalate) or DBP dibutylphthalate) in preparing the recycled PVC.”

Any position or comment about this issue is welcome

- Presentation of the Project
- Market Analysis
 - EU situation
 - EU Import/Export
 - Main Producers
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- **Technical analysis**
 - **Comments & Proposals**
 - New requirement proposals
 - Others



Criterion 6. – Energy consumption

Theme	Existing requirements	New requirements proposal	Motivation
1. Limitation of the consumption	Only a volunteer declaration is requested, without any restriction or limitation to the energy use.	To set mandatory criteria on energy consumption limitation	To limits the consumption of energy (electric and from fuels)
2.		To add a request about use of renewable energy	To implement the use of non fossil resources

- Presentation of the Project
- Market Analysis
 - EU situation
 - EU Import/Export
 - Main Producers
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- **Technical analysis**
 - **Comments & Proposals**
 - New requirement proposals
 - Others





Criterion 7. – Electric components

The criterion states that
the use of any **electric component** in the final product is **forbidden**.

To allow an enlargement of the products accessing to the award, it was suggested to modify this requirement, e.g., as follows:

- permission of using some electronics components (*to be bettered specified in advance...*);
- Introduction of a requirement for the management and the limitation of the electronic devices environmental impact (i.e: end of life, easy to remove from the outsoles, ecc...)

[Any position or comment about this issue is welcome](#)



- Presentation of the Project
- Market Analysis
 - EU situation
 - EU Import/Export
 - Main Producers
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- **Technical analysis**
 - **Comments & Proposals**
 - New requirement proposals
 - Others



Criterion 8. – Packaging of the final product

Theme	Existing requirements	New requirements proposal	Motivation
1. % of recycled materials	Cardboard = 80% Plastic bags = 100%	Packaging shall be made of 100% recycled materials	More environmentally friendly

This modification proposal aims to harmonize the criteria on packaging for all the EU Ecolabel product groups, requiring the **total recoverability** of the materials use for packaging.

Note: the European normative on packaging must be analyzed (i.e.: norms **EN 13427** and **EN 13428**).




- Presentation of the Project
- Market Analysis
 - EU situation
 - EU Import/Export
 - Main Producers
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- **Technical analysis**
 - **Comments & Proposals**
 - New requirement proposals
 - Others

*Footwear Ecolabel Criteria revision
1st AHWG meeting*

Criterion 9. – Information of the packaging

Theme	Existing requirements	New requirements proposal	Motivation
1. Environmental tools	None	To add information for: -other environmental tools adopted by the firm (i.e. Emas, 14001, EPD); -short description to make aware the customers about Ecolabel;	Clearness to the consumer
	“These shoes have been treated to improve their water resistance. They do not require further treatment”	To eliminate the phrase	Not applicable to all families
2. User instructions	“Where possible repair your footwear rather than throw them away. This is less damaging to the environment”	To eliminate the phrase	Damaging for the brand

- Presentation of the Project
- Market Analysis
 - EU situation
 - EU Import/Export
 - Main Producers
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- **Technical analysis**
 - **Comments & Proposals**
 - New requirement proposals
 - Others



*Footwear Ecolabel Criteria revision
1st AHWG meeting*

Criterion 10. – Information appearing on the eco-label


The decision text cites:
“Box 2 of the eco-label shall contain the following text:
— low air and water pollution,
—harmful substances avoided.”

No comments on these criteria have been received.
The requirement does not need changes.

Criterion 11. – Parameters contributing to durability

Theme	Existing requirements	New requirements proposal	Motivation
1. Parameters value	Outsoles abrasion resistance	To interchange the value for the categories “school” and “casual”	More appropriate
2. Classes	see Commission Decision L77/56	To reduce the number of classes	To facilitate the applicant
3. Applicability	None	To give the possibility of testing only a representative selection of shoes	To facilitate the applicant


- Presentation of the Project
- Market Analysis
 - EU situation
 - EU Import/Export
 - Main Producers
 - Footwear classes data
 - Summary
- Ecolabelled Footwear
- Legislation analysis
- **Technical analysis**
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*Footwear Ecolabel Criteria revision
1st AHWG meeting*

New Criteria and Requirements development

Theme	New requirements proposal	Motivation
1. Environmental indicators	Introduce more environmental performance indicators to obtain the Ecolabel as for example: waste production/pair, energy consumption (kWh)/pair	To improve environmental performances
	To provide the indication of the emission of CO ₂ (carbon footprint) form process	Climate declaration for consumer
3. Materials purchasing	To encourage a Short Chain for the raw materials supply	Better management of materials transports; To favourite local economy
4. Renewable resources	To introduce requirements on materials/products from renewal resources	To implement the use of renewable resources
	To introduce requirements on biodegradable materials/products	To implement the use of renewable resources
6. Wooden components	To introduce criteria on wooden materials	To improve environmental performances



*Footwear Ecolabel Criteria revision
1st AHWG meeting*

Others....

General comments

- Promotion of the EU ecological label
- Scarce advantages in the Ecolabel award from the applicant point of view

↓

Suggestions

- To put **incentives** for the producers that want to approach the Ecolabel
- To develop **advertising campaign**.

