



RÉSUMÉ OF DISCUSSION AT THE INTEGRATED PRODUCT POLICY WORKSHOP

ENVIRONMENTAL PRODUCT INFORMATION

Brussels, 7th June 2006

The IPP Working Group on Product Information organised a workshop to discuss the findings and policy recommendations and actions of the draft final report on environmental information for products and on how this can contribute to better a policy.

The suggested framework by the working group includes setting of a vision, a recommended structure for administrative action, and supporting legal and regulatory framework. The framework elements are: ensuring the quality of information placed on the market, being able to require standardised declarations in priority situations, and promoting awareness of good-quality environmental information for products.

The following is a summary of the workshop discussion:

- The report's analysis, conclusions and recommendations for making environmental information on products a driving force for improved environmental performance and more effective environmental policy were generally welcomed.
- The analysis in the report was considered to give a correct and fair picture of the present situation and a robust foundation for further actions. The conclusions flow logically from the analysis and the recommendations are practical.
- There was broad support for the recommendations covering all three elements of the framework approach set out in the working group report.
- There was a strong case for action at EU level to exploit the potential of product environmental information. There were clear benefits in terms of making other policy tools work more effectively, supporting fair competition and better regulation.
- Areas identified where more details or further material would be desirable includes analysis of the activities of the various 'framework' and 'market' actors, common issues with relevant product policy instruments, such as green public procurement and eco-design, and analysis of existing policy measures and technical standards.

1. BACKGROUND INFORMATION ON THE WORKING GROUP

Following the adoption of the European Commission's Communication on Integrated Product Policy (IPP)¹ in 2003, and the subsequent establishment of the IPP Regular Meeting, it was agreed to set up a Working Group on Product Information. The aim of the Working Group is to propose improvements in this important area for the development of IPP, through the participation of relevant experts.

The Working Group on Product Information was set up by the IPP Regular Meeting in September 2004 and was given a mandate to develop the issue on environmental information for products. The Working Group's tasks were broadly to identify the needs for product life cycle information throughout the product chain, examine the information tools available for these needs, identify the gaps and opportunities for environmental information on products, and finally to propose recommendations and policy advice and actions how the situation should be improved.

The Working Group of a dozen experts from industry, authorities, NGOs and research has met during the last year in five separate meetings. All the members of the Working Group have volunteered to participate and paid for their own expenses and time etc. Chairman of the Working Group on Product Information is Mr Bob Ryder, UK Ministry for the Environment (DEFRA).

The time frame of the Working Group was completion of its work within twelve months (April 2005 to April 2006). The work process and information sharing during its work has been open, but there have not been public consultations or similar actions during the work process. There has been no additional financial means in the Working Group for external studies or experts, etc.

2. BACKGROUND TO THIS WORKSHOP

The Working Group decided to organise a final half-day workshop and to present and discuss the draft final report to larger audience. The objective was to discuss its findings in detail, with the main part of the discussion focussing on the recommendations.

The IPP Regular Meeting participants were invited to attend the workshop as it was organised back-to-back with the IPP Regular Meeting the day before. In addition, members of the Working Group on Product Information were invited to attend the workshop along with relevant officers from European Commission services.

A draft final report dated 23.05.2006 prepared by the Working Group was distributed to the workshop participants prior to the meeting. The report consists of analysis part (Sections A-D) and a conclusion and recommendation part (Section E).

¹ Communication on Integrated Product Policy – Building on Environmental Life-Cycle, (COM(2003) 302 final)

The following key questions formed the basis for the workshop discussion:

- Does the analysis give a correct and fair picture? Have you identified any significant gaps or errors? Is the analysis a robust foundation for further actions?
- Do the conclusions of the report fairly reflect the analysis? Is the 'vision' clear? Does the overall approach of the recommendations - a 'package' of actions led by EU and Member States - make good sense?
- Are the individual recommendations logical and practical? Are they enough to fulfil the vision? Could they be improved or strengthened, and how?
- Can you suggest priorities (from the report's recommendations or additionally) for concrete actions, immediate and medium-term, for stakeholders, Members States and the European Commission?

The workshop was chaired by Mr. Bob Ryder, who had acted as chairman of the Working Group. A list of workshop participants is presented in Annex 1.

This workshop and concluding resume are the last activities of the IPP Working Group on Product Information before handing over the final report (which would be 'tidied up' after the workshop discussion) to the IPP Regular Meeting and to DG Environment of the European Commission.

This document summarises the discussion at the workshop. There was no attempt to reach formal conclusions, and the fact that a particular viewpoint was expressed at the meeting without being contested does not necessarily mean that the European Commission accepts it.

3. DISCUSSION OF ANALYSIS, REPORT SECTIONS A-D

To facilitate the discussion of the analysis Sections A-D of the draft report, a presentation was made by the Working Group by the Chairman. Slides from the presentation are in the first part of Annex 2.

The report structure and Sections A-D are in short:

- Policy background for effective action:
 - the policy importance of product information;
 - the value which product information can add;
 - the contribution of product information to the success of IPP and the wider 'SCP' agenda.
- Market conditions in which actions must work:
 - 'framework shapers': governments, standard bodies and other market influencers;
 - 'market players': producers, retailers, purchasers and end-consumers
 - barriers and gaps in providing and using product information.
- The bigger picture into which the many elements can fit.
- Barriers, gaps and opportunities.

The Chairman also presented the outline and objectives of the Working Group, and pointed out that this is the first policy group set up by the IPP Regular Meeting. It was underlined that the work on environmental information for products has a life cycle base.

The Chairman added to the above that the picture with so many framework shapers and market players could be seen as rather 'depressing reading', as it contributed to a lot of complexity, especially as there is no common approach or goal for environmental information on products and no sense of a 'bigger system'. In order to improve the presented situation and making environmental information for products a driver for improved environmental performance and more efficient environmental policy, an overall purpose, goal and action plan should be specified.

The Chairman however pointed out several opportunities that can be strengthened or developed, mainly by working in existing market relationships in business-to-business and private/public partnerships, and by having a new approach towards different environmental policy areas, such as ETAP, GPP, EuP, EPD, eco-labelling, and EMAS.

The following summarises the workshop discussion on Sections A-D:

- (1) A general impression was that participants **welcomed** the report, and expressed support for the work made by the working group and the analysis suggested.
- (2) Participants seemed broadly to agree that the analysis gives a **correct and fair picture**.
- (3) Similarly the analysis seems to form a **robust foundation** for further actions for product information to contribute to more effective policy.
- (4) Furthermore, the participants **did not identify any significant errors**.
- (5) The report could however be **more specific on actors and drivers**, roles, conditions and supporting factors for both framework shapers and market players.
- (6) The report could also be **more specific on** common issues and lines of interest on how environmental information for products can be used for product-related **policy instruments**, such as the development of eco-label criteria and in GPP.
- (7) The report could also build in an **analysis of existing policy applications**, i.e. practice cases studies on environmental product information.
- (8) Several comments were made on **possible further analysis**, including:
 - a. The need for a robust and continuously up-dated **evidence base system** for the provision and supply of life cycle data.² Related to this is the need for **quality assurance** for such life cycle information.
 - b. Product information should present data and information on relative **performance** and environmental **improvement**.
 - c. The **consumer side** is for some readers something that could be expanded in the report - for example, to elaborate on demand side driving forces, and substantiate the **added value** for consumers of using environment information for products. This could include improvement options for

² In future RTD7 programmes, the DG RTD will put a mandatory requirement on complementary LCA.

increased consumer interest for the environment and SPC³, **awareness** raising by addressing Member States and consumer NGOs, also taking into account consumer **behaviour**.

- d. Further on the demand side, the role and responsibility of the promotion and **advertising industry** should be elaborated. This industry can be seen as adding to the pressures by pushing for greater consumption.
 - e. By **linking** environmental information for product with **other information systems**, e.g. economics (make then use of information in the supply chain) technical systems (see para 37 and 39), by adding product information to statistical system information, or by making links to information on workers health and safety (OH&S). The intention should not be the building of new information systems as such but developing from existing structures and **priorities**, considering e.g. EIPRO on environmental impact for products.⁴
 - f. The **roles** for the actors and the '**manoeuvre space**' for action; who does what with what kind of information?
 - g. Additional information on **life cycle costing** (LCC) should be considered and developed in relation to environmental information for products.
 - h. It should be clear that each **ISO** management standard Type I, II and III on labelling and declarations has a value for different actors and consumers.
 - i. The **global (trade) dimension** should be stressed in the report, e.g. WTO.
 - j. The ultimate design of environmental information for products would be combining closing of the economical loop as for the material loop. Doing this, information on **internalisation of environmental externalities** would be integrated the environmental information. The price information for customers on the shelf would thus represent a 'from-cradle to-shelf' price.
- (9) The following points were suggested as **technical improvements** of the report:
- a. The specific expression 'evidence base' could be misunderstood.
 - b. Recommendations and proposals should be placed first in the report.
 - c. In illustrating the complexity of possible information flows in the supply chain, Diagram 2 is difficult to understand and/or misses the reverse arrows.
 - d. The report uses 'standards' in a 'management' context, rather than as meaning 'product standards'.
 - e. Diagram 1 should refer to life cycle thinking (LCT) rather than LCA.
 - f. Price information on internalisation of environmental externalities representing a 'from-cradle to-shelf' price could be added on page 5.
 - g. Some headings have been used twice - as for barriers and gaps, Sections C-D.
 - h. Make more explicit link to the European Platform on Life Cycle Assessment project, e.g. in para. 41 by adding a third bullet.

³ Sustainable production and consumption.

⁴ See <http://ec.europa.eu/environment/ipp/identifying.htm> and report 'Environmental Impact of Products'.

4. DISCUSSION OF RECOMMENDATIONS, REPORT SECTION E

To facilitate the discussion of the conclusions and recommendations in Section E of the report, the Chairman made a further short presentation. The slides are in the second part of Annex 2.

The report structure and Section E are in short:

- Conclusions from the analysis made by the working group.
- Recommendations for a new 'framework' approach:
 - i) vision and framework thinking:
 - governmental 'framework' role – recommended approach
 - ii) administrative and practical measures and awareness:
 - recommended structure for administrative action
 - better linking of policy tools – the example of GPP
 - iii) legislative framework:
 - ensuring the quality of information placed on the market
 - requiring standardised declarations in priority situations
 - promoting awareness of good-quality product information

The following summarises the workshop discussion on recommendations in Section E:

- (10) A general impression by the workshop participants is that the conclusions and recommendations made in the report **fairly reflect the analysis**.
- (11) This leads to a **good case for action** on environmental product information at EU level, putting a policy priority on environmental information for products. This would be for the benefit of an increased policy efficiency policy, better regulation, and for policy-making by Member States and business stakeholders.
- (12) However, the **vision** must be clear, reflect the long-term objectives and policy challenges, and also make good sense of the 'package' of recommendations.
- (13) Furthermore, a general impression from the workshop is also that the individual recommendations suggested are **logical and practical**.
- (14) The suggested recommendations were **supported** by some **business participants**. They accepted that a suitable 'legislation framework' would help to provide a common platform and reference area for product information, and to support fair competition.
- (15) Furthermore, some business participant suggested that **research** is needed complementing existing knowledge and for understanding why and when ISO Type I, II and III labels and declarations are well-placed and contributing to barrier, a barrier, etc.
- (16) The suggested recommendations were also strongly **supported** by some **environmental non-governmental** participant. The main **benefits** with the suggested framework would be to work towards getting better products recognised in the market, putting minimum quality requirements for information in place, and to allow easier benchmarking on environmental performance. It

- would also be beneficial to avoid duplication work on product data and information assessments.
- (17) Achieving the benefits as seen by some environmental non-governmental participant, the suggested legislation part in the recommendations is more for enabling power and therefore needs to be **strengthened**. It would also be necessary to build a common legislation framework for product policies, including and linking to eco-labelling and EuP.
 - (18) **Benchmarks and indicators** for relative performance are needed for the provision of simple information to consumers. For this a **new structure** and level expected for product indicators is needed. Such structure can be based on the life cycle based '**information modules**' as in the new standard ISO 14025 on environmental declarations (EPDs). It is important to secure that sectors not only will use EPDs for data. There is a need for advanced harmonised data and methodology.
 - (19) The agreed benchmark and indicator structure should start from the end-points, i.e. consumers and business. Doing this, clear **end-point requirements** needs to be defined, primarily minimum requirements, benchmarking data, and **key priorities** for products and environmental aspects and impacts.
 - (20) The recommendations should to a larger extent be **based on existing practices** and coordinated with relevant **non-environmental legislation**. In order to use product data and information more efficiently, i.e. for criteria development and benchmarking and in eco-design, a **coherent policy approach** is needed.
 - (21) Several comments were made on how **to improve and strengthen** the recommendations, where the following are the most significant:
 - a. The recommendations for administrative and practical measures must also address i) the need improved data using existing **technical information systems**, ii) rationality through changed **consumer behaviour**, and iii) development of a **demand-side policy** for customer information.
 - b. The recommendations should apply more widely to the **global context** and also to trade and **WTO** regulation.
 - c. Address the **right for consumer information**, as in the Åhus Convention.
 - d. Consequences and impact for **SME** needs special attention.
 - (22) The following points were suggested as **technical improvements** of the report:
 - a. The recommendations should rather be considered 'innovative' than 'new'.
 - b. Clarify if the vision statement from the introduction chapter also is final.
 - c. The word 'legislation' in the recommendations could possibly be replaced by 'legislative (or regulatory) framework'.
 - d. Clearly state and make sure not every SME has to do a full LCA.
 - e. Make use of Impact Assessment of the recommendations when developed.
 - f. Section E Chapter 3.2 on EuP, 2nd bullet, is misleading.
 - g. The conclusion statement that that environmental information can be used for making change is missing as a first bullet in box on opportunities page 17. Add bullet from page 6 that environmental information is central.

- h. The governmental framework role (page 19) should also address consumers.
- i. The suggested priority actions should be placed up-front in the report.
- j. The priority actions should to a greater extent elaborate and give explicit details how things should be done.

The following summarises the workshop discussion on suggested **priorities** by the workshop participants. The priorities are based on the report's recommendations but also identified need for immediate and medium-term actions addressing all parties involved including businesses, organisations, Member States and the European Commission.

The following is a suggested short-list of priorities for kicking-off the actions:

- First of all, make sure that the recommendations and actions really **take place**.
- After finalisation of the report, publish and distribute the report and think of a **dissemination strategy** for influencing and making most use of the report.
- Allocate **financial resources** for the framework and actions on 'administrative and practical measures' in Chapter 2. Implementation of recommendations suggested in Chapter 3 'Legislative framework' would depend on this.
- Further develop the **vision**, a common **framework** and **actions** as of the report. The legislation framework should be for all relevant products polices and also coordinated with relevant non-environmental legislation and consumer needs.
- Develop a new structure for environmental **benchmarks** and indicators based on the life cycle based 'information modules' as in ISO 14025, starting from end-point requirements and key environmental aspects and key product areas.
- Study **existing practices** and standards of environmental information on products. This would support the development of a coherent framework policy.
- Address the need for **technical information systems** using existing structures.

THE END