Report on the Public Consultation


In line with the Commission's commitment to transparent and interactive policy-making, this document sets out to provide an overview and general impression of the feedback received by the Commission in the context of a public consultation. The statements and opinions expressed in the document do not therefore necessarily reflect those of the Commission.
Table of contents

1. Introduction 3
   1.1 Structure of the report 3
   1.2 Background 3
   1.3 Sample representativeness and limitations 4

2. Information about respondents 4
   2.1 Respondents by country 4
   2.2 Respondents by field of activity 5

3. General knowledge about Ecolabelling 5

4. Changing institutions: modifying the framework of the EU Ecolabel 8
   4.1 An Ecolabel bureau 8
   4.2 A new Ecolabel Board 9

5. Possible measures for improving product groups and criteria definition 10
   5.1 Ambition levels 10
   5.2 Criteria development guidelines 13
   5.3 Other ways of developing criteria 14
   5.4 Criteria documents 14
   5.5 Criteria revisions 15

6. Application, validation and fees 15
   6.1 Assessment and verification 15
   6.2 Fees 16

7. Ecolabel policy links 16
   7.1 Harmonisation of the EU Ecolabel with the other ecolabelling schemes 16
   7.2 Green procurement: how to use the Ecolabel as an incentive to support and foster green procurement, and to enable the Ecolabel in turn to benefit 17
   7.3 Fiscal incentives for Ecolabelled products and companies 17
   7.4 Green claims 18
   7.5 Gradual extension of the EU Ecolabel, towards sustainability 18

8. Conclusions 19
1. Introduction

1.1 Structure of the report

This report presents an overview of the results of the Commission’s public consultation on the revision of The Ecolabel Regulation (EC No 1980/2000). The first part includes background information. The second section provides an overview of the respondents involved in the consultation process. The main body of the report contains the analysis of responses received from the internet questionnaire. Conclusions can be found at the end of this report.

1.2 Background

The EU Ecolabel (The Flower) is the EU’s own high-level award scheme for products which meet very high environmental standards.

Businesses which can show that their product meets the demanding criteria set by the scheme can apply to the body running the scheme in their member state (the Competent Body) to use the Ecolabel's Flower logo on the product and in advertising. The scheme currently covers twenty-four product groups, including tourist accommodation and campsites, and the logo appears on thousands of products across Europe.

The Ecolabel was originally established by an EU Regulation in 1992, which was revised in 2000. The Commission, which coordinates the running of the scheme, is currently reviewing and revising it again. The public consultation, which was carried out through an online questionnaire, was the second part of a process which began with an evaluation study in 2005.

The evaluation study concluded that the original ideas behind the voluntary scheme were still valid and desirable from a business perspective: The EU Ecolabel provides EU consumers with an environmental certification they can trust, unlike certain other labels which are 'self-claims'. Additionally it can give businesses the opportunity to use one label for all their pan-European or global marketing. The EU Ecolabel is the only EU-wide label of its kind.

In summary the study showed that:

- The Ecolabel has contributed to setting targets for better environmental product performance;
- It has influenced the demand for suppliers to meet high environmental standards;
- Companies participating in the EU scheme use the Ecolabel in their marketing campaigns;
- Neither users nor non-users of the Ecolabel want to see the label abolished;
- The concept of the EU Ecolabel is preferred to that of national labels.

However:

- There is still low awareness and uneven geographic take-up of the label;
- There are insufficient product group categories;
• It suffers from cumbersome procedures and organisational structures - i.e. bureaucracy which limit the Scheme's ability to grow and respond to opportunities;

• Fees and cost of getting the label are perceived as barriers;

• There is a lack of perceived public purchasing benefits.

The Commission wants to ensure that the label really does result in consumers getting a wider choice of environmentally superior products. It also wants to make the Ecolabel a tool which in practice will actively give support to other environmental measures operated by the Commission and Member States. This consultation provided an opportunity to help identify how these aims could be achieved.

The consultation looked in more detail at the issues raised by the study and sought public opinion and views on the best way forward for the EU Ecolabel in the future.

This report presents an overview of the outcomes of the public consultation.

1.3 Sample representativeness and limitations

The results of the consultation should not be seen as the opinions of the EU population as a whole, but as a representation of the views of those who are interested in the revision of the Ecolabel Scheme, were aware of the consultation and were able to fill in the questionnaire. The respondents had to have internet access and had to understand English due to the fact, that the questionnaire was only available in English. Responses were not received from all Member States.

The number of questionnaires completed was 168. The feedback was collected directly from different types of organisations, public and private institutions, NGOs, professional bodies involved in environmental management and certification, individual consultants and members of the public.

This report considers each questionnaire to be one vote despite the different kinds of respondent’ profiles. This means that the responses of public institutions, organisations and companies carry the same weight as responses given by individual consultants or members of the public.

2. Information about respondents

The respondents were not evenly spread across EU Member States.

2.1 Respondents by country
2.2 Respondents by field of activity

3. General knowledge about Eco-labelling
Do you know about EU Ecolabel?

- Yes, I know of it: 92.5%
- No, I have never heard of it: 5.2%
- I'm not sure: 2.3%

Figure 3

Do you know what the EU Ecolabel stands for?

- Yes: 92.7%
- Not really sure: 6.6%
- No: 0.7%

Figure 4

Have you heard of any other environmental labelling scheme?

- Yes: 7.6%
- Not sure: 7.0%
- No: 85.5%

Figure 5
Do you support the idea of labelling products that are less harmful environmentally than other similar products?

- **Strongly support**: 28.0%
- **Support**: 63.4%
- **Neither support nor oppose**: 4.3%
- **Oppose**: 2.4%
- **Strongly oppose**: 1.8%

**Figure 6**

Do you think that it is important that such a labelling scheme is verified by independent 'third' party?

- **Strongly agree**: 62.3%
- **Agree**: 27.8%
- **Neither agree nor disagree**: 6.8%
- **Disagree**: 2.5%
- **Strongly disagree**: 0.6%

**Figure 7**

Would you buy products bearing an ecolabel if they were the same price as other similar products?

- **Strongly agree**: 70.5%
- **Agree**: 20.5%
- **Neither agree nor disagree**: 7.7%

**Figure 8**
4. Changing institutions: modifying the framework of the EU Ecolabel

4.1 An Ecolabel bureau
Where do you think the Management of the Ecolabel might be best placed?

- In a Commission bureau: 31.4%
- In an EU Agency: 30.2%
- No opinion: 15.4%
- In DG Environment: 9.5%
- Other: 7.7%
- With a private company: 5.9%

Figure 11

4.2 A new Ecolabel Board

Do you agree with the idea of a new Ecolabel Board including stakeholders representation with voting rights?

- Strongly agree: 25.4%
- Agree: 49.1%
- Neither agree nor disagree: 10.1%
- Disagree: 11.8%
- Strongly disagree: 3.6%

Figure 12
Do you agree with the proposed role for Member States in the Ecolabel process?

<table>
<thead>
<tr>
<th>Agreement Level</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strongly agree</td>
<td>9.9%</td>
</tr>
<tr>
<td>Agree</td>
<td>41.1%</td>
</tr>
<tr>
<td>Neither agree nor disagree</td>
<td>32.5%</td>
</tr>
<tr>
<td>Disagree</td>
<td>13.9%</td>
</tr>
<tr>
<td>Strongly disagree</td>
<td>2.6%</td>
</tr>
</tbody>
</table>

Figure 13

5. Possible measures for improving product groups and criteria definition

5.1 Ambition levels

Be comparable to other quality environmental labels for that product group

<table>
<thead>
<tr>
<th>Importance Level</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>very important = 4</td>
<td>37.7%</td>
</tr>
<tr>
<td>3</td>
<td>28.3%</td>
</tr>
<tr>
<td>2</td>
<td>17.6%</td>
</tr>
<tr>
<td>1</td>
<td>11.9%</td>
</tr>
<tr>
<td>not important at all = 0</td>
<td>4.4%</td>
</tr>
</tbody>
</table>

Figure 14
Enough companies to be able to meet the criteria to respond to public calls for tender with a good applicable range of products

![Graph showing company readiness](Image)

Companies not meeting the criteria are encouraged to make changes in order to attain the label

![Graph showing importance of changes](Image)
Level of uptake of the label which will ensure a range of products for consumers to choose from

<table>
<thead>
<tr>
<th>Importance</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
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<td>40.4%</td>
</tr>
<tr>
<td>3</td>
<td>21.9%</td>
</tr>
<tr>
<td>2</td>
<td>21.9%</td>
</tr>
<tr>
<td>1</td>
<td>11.9%</td>
</tr>
<tr>
<td>not important at all = 0</td>
<td>4.0%</td>
</tr>
</tbody>
</table>

Figure 17

EU Ecolabel product group criteria must be realistically applicable across the whole of the EU

<table>
<thead>
<tr>
<th>Importance</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>very important = 4</td>
<td>39.5%</td>
</tr>
<tr>
<td>3</td>
<td>28.0%</td>
</tr>
<tr>
<td>2</td>
<td>18.5%</td>
</tr>
<tr>
<td>1</td>
<td>9.6%</td>
</tr>
<tr>
<td>not important at all = 0</td>
<td>4.5%</td>
</tr>
</tbody>
</table>

Figure 18
Ensure that 'front-runners' are interested in applying for the label

![Bar chart](chart1.png)

Figure 19

Maintain a high level of environmental credibility for EU Ecolabel

![Bar chart](chart2.png)

Figure 20

5.2 Criteria development guidelines
5.3 Other ways of developing criteria

Do you agree that alternative ways of developing product group criteria should be available, such as 'borrowing' criteria from other sources?

Figure 22

5.4 Criteria documents
5.5 Criteria revisions

6. Application, validation and fees

6.1 Assessment and verification
Do you consider the application and validation processes are a significant barrier to uptake of the scheme?

<table>
<thead>
<tr>
<th>Option</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strongly agree</td>
<td>13.2%</td>
</tr>
<tr>
<td>Agree</td>
<td>44.1%</td>
</tr>
<tr>
<td>Neither agree nor disagree</td>
<td>27.0%</td>
</tr>
<tr>
<td>Disagree</td>
<td>12.5%</td>
</tr>
<tr>
<td>Strongly disagree</td>
<td>3.3%</td>
</tr>
</tbody>
</table>

Figure 25

6.2 Fees

Do you agree with the idea of a fixed annual fee for using the Ecolabel?

<table>
<thead>
<tr>
<th>Option</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strongly agree</td>
<td>16.0%</td>
</tr>
<tr>
<td>Agree</td>
<td>36.4%</td>
</tr>
<tr>
<td>Neither agree nor disagree</td>
<td>31.5%</td>
</tr>
<tr>
<td>Disagree</td>
<td>8.0%</td>
</tr>
<tr>
<td>Strongly disagree</td>
<td>8.0%</td>
</tr>
</tbody>
</table>

Figure 26

7. Ecolabel policy links

7.1 Harmonisation of the EU Ecolabel with the other eco-labelling schemes
Do you support the idea of the EU Ecolabel setting the standard for other Type I labels?

![Bar chart showing responses to the question about supporting the EU Ecolabel.]

**Figure 27**

7.2 Green procurement: how to use the Ecolabel as an incentive to support and foster green procurement, and to enable the Ecolabel in turn to benefit

Do you think that it should be mandatory for Member States to use Ecolabel criteria (or equivalent) where possible in calls for tender?

![Bar chart showing responses to the question about mandatory use of Ecolabel criteria.]

**Figure 28**

7.3 Fiscal incentives for Eco-labelled products and companies
7.4 Green claims

Do you think fiscal measures should be pursued for Ecolabelled products?

- Strongly agree: 37.1%
- Agree: 30.2%
- Neither agree nor disagree: 10.7%
- Disagree: 8.8%
- Strongly disagree: 13.2%

Figure 29

Do you think the EU Ecolabel criteria should be used to set rules on product 'green' claims?

- Strongly agree: 16.1%
- Agree: 35.4%
- Neither agree nor disagree: 18.0%
- Disagree: 16.8%
- Strongly disagree: 13.7%

Figure 30

7.5 Gradual extension of the EU Ecolabel, towards sustainability
8. Conclusions

Several key findings emerge from the consultation:

Encouragingly, 92.5% of respondents declared that they knew about the EU Ecolabel and 92.7% knew what it stood for. Continuing strong support was noted (63.4%) for the whole concept of labelling products that are less harmful environmentally than other similar products. A high percentage of respondents (62.3%) also supported the independent 'third' party verification of the EU Ecolabel scheme.

69% of respondents affirmed, that the organisational framework of the EU Ecolabel should be changed with only a small amount (3.5%) in disagreement. 74.5% of all respondents asserted in favour of a new Ecolabel Board being formed to include stakeholders representation with voting rights.
Most importantly, an overwhelming 77.7% agreed or strongly agreed with the idea of allowing, in the future, for 'fast tracking' of revisions, corrections and appeals of criteria.

A whopping 91.7% of respondents agreed that the Scheme should aim for standardised Ecolabel criteria documents.

61.4% of those who took part in the consultation agreed with the premise, that it should be mandatory for Member States to use Ecolabel criteria (or equivalent), where possible, in public procurement tendering processes.

**Other general observations include the following:**

On the issue of price, 91% of respondents stated that they would buy products bearing an ecolabel if they were the same price as other similar products, and 76% stated that they would buy eco-labelled products if they were a little more expensive than other similar products.

For the public purchasing market, 83.2% respondents find it imperative that there are enough companies able to meet the criteria in order to respond to public calls for tender with a good range of products and 90.5% find it essential that companies not meeting the criteria are encouraged to make changes in order to attain the label.

With regards to the EU Ecolabel product group criteria, these must be realistically applicable across the whole of the EU according to the 86% who saw it as a factor of importance to the future success of the Scheme. Making the Scheme interested to 'front runners' was also important for 68.6% of respondents.