

Minutes of the Expert Group

18 April 2024, hybrid meeting

Meeting of the European Union Ecolabelling Board

0. Adoption of the agenda and of the November 2023 minutes

The minutes of the November 2023 meeting as well as the agenda for this meeting were adopted. It was explained that in the future minutes will be considered final, adopted and published once all comments received within the commenting period have been integrated.

1. List of points discussed

Policy and EU Ecolabel and GPP updates, EU Ecolabel assessment and future developments

09:35 – 09:55 Update on policy developments – EC, DG ENV

The Directorate-General for Environment (DG ENV) gave an overview of relevant policy developments under the Circular Economy Action Plan. Priorities for the next mandate of the European Commission are to convey the message that schemes such as EU Ecolabel can be a tool for competitiveness as well as for the implementation of legislation under the European Green Deal. Awareness should be also raised on schemes like the EU Ecolabel. This is a collective effort hence all EUEB members are encouraged to put a focus on communication.

DG ENV is updating the strategic EU Ecolabel Workplan, a draft of which will be shared with EUEB members ahead of the next EUEB meeting in November 2024.

09:55 – 10:10 EU Ecolabel and GPP updates – EC, DG ENV

DG ENV gave an overview on the development of the number of EU Ecolabel licences and products, highlighting that as of March 2024, 2 743 (+6%) licences and 95 758 (+8%) products were awarded. More details are available on the [EU Ecolabel website](#).

DG ENV completed the corrigendum on Growing media and soil improvers to align the content of recital 11 with the validity date. Criteria for detergents, paints and varnishes, and textiles are under revision. **All CBs and interested stakeholders are invited to register for the stakeholder consultation on the revision of Textiles criteria.** DG ENV proposed a vote on the prolongation of the validity of the current criteria for tourist accommodation services, graphic paper and lubricants in June 2024.

DG ENV and Ecolabelling Denmark will host a webinar on 23 May 2024 on the updated DID list for interested stakeholders. DG ENV presented updates on the on-going revision of ISO

standards (ISO 14021, ISO 14024, ISO 14025). For the time being, DG ENV is not officially participating in the processes.

Main ongoing EU Ecolabel activities include the development and implementation of the EU Ecolabel Strategic Communication Work-Plan and developing EU Ecolabel partnerships with retailers and other strategic networks/multipliers.

Five user manuals for public authorities for the use of EU Ecolabel products in Green Public Procurement (GPP) are under finalization (planned for June 2024) and work on GPP User Manuals on Reusable menstrual cups is in progress. Several legislative initiatives foresee the development of mandatory GPP criteria. DG ENV highlighted that the LIFE call for proposals will open on 18 April 2024 and encouraged EUEB members to share this information/apply, and also use the Technical assistance and information exchange (TAIEX) tool which provides various funding opportunities.

10:10 – 10:30 Q&A

CB DE asked if DG ENV is part of the working group on the development of Product Environmental Footprint Category Rules (PEFCR) of Textiles and is commenting on the consultations. DG ENV clarified that the European Commission (EC) is overseeing the process and in this role is not allowed to comment. The JRC participates in meetings of the technical secretariat as observer and contributes to consultations.

CEFIC asked for more details on the Green Claims Directive. DG ENV confirmed that work on the Green Claims Directive is progressing with a vote by the European Parliament expected in June 2024. DG ENV highlights several important current workstreams the EC is focusing on such as water, textiles, circular economy (to be resource efficient and close the material loop), as well as to establish more links between the bioeconomy and circular economy.

The EUEB president asked about the synergies between Corporate Sustainability Reporting Directive (CSRD) and the EU Ecolabel. DG ENV highlighted that CSRD is rather linked to EMAS and that the link to the EU Ecolabel is less evident. EMAS colleagues are following the developments closely.

CB DE confirms that colleagues from Blue Angel and Austrian ecolabel are present at the meetings on the revision of ISO standards and encourages DG ENV to actively take part as well.

CB DK asked for further clarification on the status of financial products criteria development. DG ENV confirmed that EU Ecolabel criteria for retail financial products are currently on hold, and finalisation will not be possible before the end of the current Commission mandate.

CB NO and CB DK asked for further clarification on the synergies with EU initiatives. DG ENV mentioned a few initiatives/networks they are collaborating with such as the Tourism Transition Pathway, the Climate Pact network of ambassadors, the Enterprise Europe Network and the Green Capital network. This week the EU Ecolabel Showroom is present at the Consumer Summit in Brussels. **EUEB members and observers are invited to share interesting networks at EU/international level that DG ENV could contact.** CB DE recommends taking part in the Procura+ conference which could be interesting for the EU Ecolabel.

10:30 – 11:30 Strategic EU Ecolabel Workplan 2020-2024:

Assessment and new horizons – EC, DG ENV and EUEB President

DG ENV and EUEB President presented the results of the assessment from EC and EUEB members of the implementation of the strategic EU Ecolabel workplan 2020-2024 focusing on the three overarching strategic priorities. EUEB members are still invited to share their opinions and experiences in the survey.

Tour de table on priorities for 2025-2029

CB PT asked for more explanations on the funding opportunities in the LIFE call. DG ENV explained that LIFE supports both large-scale strategic projects and "standard" projects. The LIFE funds cannot in principle be used to cover EU Ecolabel application costs, but for example they can be used for the promotion of the scheme among certain industries (e.g. past projects on EU Ecolabel in the Tourism sector).

CB PT, CEFIC and CB DK enquired about possible synergies and overlaps between the EU Ecolabel and the Ecodesign for Sustainable Products Regulation (ESPR). DG ENV answered that ESPR will soon be adopted with the work plan produced afterwards which will contain the products that will be covered. DG ENV will closely monitor the developments and will align the timing of the EU Ecolabel revisions with ESPR as much as possible, to create synergies between the EU Ecolabel criteria and ESPR requirements without revising the EU Ecolabel regulation. CB DK noted that, albeit heavily criticised 15 years ago, the EU Ecolabel regulation actually was an updated and modern piece of life-cycled based legislation with - also today - updated basic criteria on e.g. hazardous chemicals (the reference to CLP and REACH). Hazardous chemicals that are up to debate in the context of Green Claims Directive.

CB SE proposed to revise the Annex III of the EU Ecolabel Regulation to be able to raise the maximum fees or to index-adjust the fees in order to cover the costs of the application. CB DK agreed on considering index adjustment of the absolutely fees, i.e. the application fees and minimum fees towards inflation etc. will ensure the fees follow the inflation and so reduce the need for frequent fee adjustment. CB PT proposed the idea to base the fees on turnover, which would generate reliable data on turnover which is also an indicator for communication activities. CB ES reflected on lowering the value added tax for EU Ecolabel products as measure to promote EU Ecolabel products. DG ENV was interested in the reasons for raising the application fees because it might contradict the claim that EU Ecolabel is not expensive for companies. CB SE answered referring to geographical differences in salaries/labour cost.

CB DK asked if DG ENV will also continue work on GPP besides the mandatory GPP criteria in e.g. ESPR, emphasising that the EU GPP criteria work should not be stopped before we know how the mandatory legislation works. DG ENV answered that due to resource availability, a focus at the moment was put on mandatory GPP criteria and the development of GPP Manuals.

Plastics Recyclers Europe mentioned that in case of product group extensions, products to be prioritized are those not yet regulated by legislations but of which the recycled plastic content could be improved. Examples are electronic products, household products, automotive products. DG ENV will keep this in mind, but also needs to prioritize on activities and does not foresee to develop criteria for new product groups at the moment.

Updates on ongoing criteria revisions

11:50 –12:15 EU Ecolabel criteria for Paints and Varnishes – EC, JRC

The JRC presented updates on the criteria revision for indoor and outdoor paints and varnishes. Initial feedback suggested to simplify the readability of the criteria applicable to each product type by splitting the current annex into two separate annexes, one for paints and one for varnishes. Stakeholder input and desk research led to the potential introduction of two new criteria on: 1) VOC emissions; and 2) carbon footprinting (CF) or Product Environmental Footprinting (PEF). **The JRC invited stakeholders to comment on the draft Technical Report 1 until the deadline of 22 May 2024** (through BATIS and by sending an email to JRC-for issues regarding access). All relevant information can be found in the draft Preliminary Report and Technical Report 1 .

CB PT enquired about the JRC's rationale regarding offering a choice between CF and PEF. The JRC and DG ENV responded that CF was chosen based on the availability of data and due to the fact that CF will become a regulatory market requirement in the future. A more technical discussion will take place during the first ad-hoc working group (AHWG) meeting. Once all stakeholder feedback is collected, a decision can be made as to whether or not the criteria can be proposed for the next Technical Report 2.

CB DK asked the JRC for feedback regarding their decision not to include linseed oil paints in the revision, and the possibility to substitute ADH (Adipic acid dihydrazide) and the preservative IBPC. The JRC reassured CB DK that the possibility to include linseed oil can be discussed during the first AHWG meeting.

12:15 – 12:45 EU Ecolabel criteria for Textiles – EC, JRC

The JRC presented the preparatory study on Textiles for product policy instruments including the ESPR framework. Suggestions from stakeholders for the revision included simplification of the application process, harmonisation with other ecolabels, and alignment with requirements set in the ESPR. **All EUEB members are invited to participate in development of the preparatory study** (instructions available [here](#)). CB DK asked if the focus of criteria revision is aligned with ESPR focus on apparel. The JRC confirmed that at the moment the scope of the preparatory study underpinning both ESPR requirements and the revision of EU Ecolabel criteria focuses on apparel, divided into ten categories: textiles (t-shirts, pants, shirts, blouses, socks, tights, underwear, swimwear); and accessories (hats and ties).

CB PT asked how market surveillance will work for consumer products and intermediate products within the same scope of a measure. The JRC explained that the other ESPR working group focussing on steel as an intermediate product are more informed about the surveillance of intermediate products. The JRC added that the surveillance of final products in Europe might be challenging since each member state works in a different way. The EC is working to reinforce surveillance authorities and streamline checks (e.g. using digital passports) but a final decision is yet to be made.

BEUC/EBB asked how the JRC intends to approach the sub groups that are not prioritised for the ESPR but are in scope of the EU Ecolabel and whether these sub groups would be discussed in the AHWG. The BEUC/EBB emphasised the importance of keeping intermediate fabric products in the scope due to significant uptake in this area. The JRC responded that they would like to keep all products in the scope of EU Ecolabel where possible, but are facing technical problems within the new ESPR framework that make setting criteria for intermediate products within an eco-design aspect difficult. Future preparatory studies will focus on other products such as home/interior textiles and textile cleaning products. In the future, an AHWG will be organised to cover specifically the revision of the EU Ecolabel criteria for textiles.

14:15 – 14:45 EU Ecolabel criteria for Detergents – EC, JRC

The JRC shared updates on the ongoing criteria revisions for detergents, which included as main milestones: the completion of a focused questionnaire; the publication of a set of documents associated to the 1st draft criteria proposal (Preliminary Background report & Technical Report 1); and the consecution of the 1st Ad Hoc Working Group (AHWG). In particular, the presentation focused on stakeholders' reactions (comments) to the 1st draft criteria proposal. Forthcoming workstreams include finalising processing of the questionnaire inputs, smaller AHWGs covering key complex topics (Fitness for use, Microbial containing products, and others) and publication of the second technical report (TR2) and the updated preliminary report, which will be presented at the second AHWG in Q4 2024 (tbc).

CEFIC noted that some CBs might interpret the criteria differently to other CBs, leading to a potential differential awarding of certifications. CEFIC asked the JRC if this is specific to detergents or happens in other product groups (PGs) too. The JRC explained that this issue is not dealt with in EU Ecolabel revision and invited those with experience to share their knowledge. DG ENV confirmed that a differential awarding of products should not happen at the member state level and that to this extent the CB Forum is established to ensure harmonised approach.

CB PT initially asked which issue on fitness for use the JRC would like to discuss further. Then, CB PT also asked if the threshold limit applicable to ingoing substances should be changed to analytical detection limit and if the EU Ecolabel would maintain the limit value for presence of impurities at 0.01% (CLP states 0.1%). On the 1st question, the JRC informed CB PT that some standards have been updated but more importantly several protocols refer to the market reference product or formulation. There have been attempts to harmonise protocols so that they are the same as the reference concentration. This is a significant workstream for which JRC requires input from all stakeholders. Suggestions made for protocols missing for specific product groups would need also to be discussed in detail with expert actors. The purpose of the smaller AHWG is to have a more consolidated version to be presented at the 2nd AHWG meeting. The consolidated version will then be shared for comments/feedback. With regards to the 2nd comment, the JRC further clarified that, as raised in the first AHWG, there is a mismatch regarding the threshold for impurities (definitions etc.). The JRC is considering to revise this and make the proposal more harmonised but are unable to align with 0.1% CLP because 0.01% (weight by weight) is a harmonised concentration among all EU Ecolabel product groups. To ensure that the criteria text remains clear, DG ENV asked all members to check the draft criteria. In case of different interpretations among licence holders (LHs), CBs

should inform the HD so that a virtual CB Forum can be initiated. DG ENV complemented JRC by adding that the decision to stay below 0.01% for products that come into contact with skin or mixtures stems from the results of the chemical task force.

CB SE asked if the criteria somehow address transport packaging, as it is sometimes interpreted as group packaging. The JRC is aware of this issue and plan to further clarify how transport packaging should be interpreted in the text and potentially also in the user manual. Currently only primary packaging is included in the new proposal for the 'Recycled Materials Content' criterion and not the secondary packaging, but this aspect is still being revised and the JRC is waiting for the final conclusion from the CB Forum on Absorbent hygiene products.

Assessment of existing criteria

14:45 – 15:10 Assessment of current EU Ecolabel criteria for paper – EC, JRC

The JRC presented the results of their assessment on the current EU Ecolabel criteria for graphic paper. The assessment purposed to verify continued suitability and relevance of Commission Decision (EU) 2019/70. The JRC concluded that although Commission Decision (EU) 2019/70 is still up to date, the user manual could be updated to better clarify some aspects, and the criteria's next revision should apply knowledge generated by the subsequent update (planning still not known) of the best available techniques reference document on pulp, paper and boards, and guarantee synergies with potential eco-design criteria in the framework of the PEFCR. Thus, the JRC recommended a prolongation by four years for Commission Decision 2019/70. EUEB members were asked about their opinion on the prolongation and did not object. DG ENV proposed a vote on the prolongation of the validity of the current criteria for graphic paper in June 2024.

15:10 – 15:35 Assessment of current EU Ecolabel criteria for lubricants – EC, JRC

The JRC provided a short update on the revision of the EU Ecolabel for lubricants considering results from the questionnaire in 2022, the commission statement of the last criteria revision, regulatory framework updates and CB Forum discussions. Apart from the ESPR work plan which is expected to be approved and adopted in Q1 2025, the regulatory framework affecting industry, product and substance level is still under revision and the topics to be addressed in the next revision are strongly related to the regulation under revision. The JRC concluded that harmonization between the requirements of the different policy instruments, whether specific or sectoral, will help to achieve compliance. To avoid unnecessary burdens, the establishment of limits to reward environmentally less impactful products should build on the mandatory thresholds solidly proven in existing legislation. The JRC recommended to extend the current criteria of Commission Decision (EU) 2018/1702 by at least four years and postpone the EU Ecolabel revision until the regulatory framework directly affecting lubricants is more consolidated. EUEB members were asked about their opinion on the prolongation and did not object. DG ENV proposed a vote on the prolongation of the validity of the current criteria for lubricants in June 2024.

EU Ecolabel Communication

15:35– 16:05 Strategic EU Ecolabel Communication Workplan – EU and Communication Task Force actions in 2024 – EC, DG ENV /contractor

DG ENV and the contractor presented an update on the implementation of the Strategic Multi-annual EU Ecolabel Communication Work Plan and the current activities of the EU Ecolabel Communication Task Force. The priorities under "EC EU Ecolabel Communication Plan for 2024" were presented, with the two strategic priorities: to increase EU Ecolabel recognition and trust by 2.5% and to increase the EU Ecolabel uptake by 5% in 2024.

CBs are invited to indicate their interest to host the EU Ecolabel Showroom “Running your sustainable lifestyles” to activation-euecolabel@arctik.eu. EUEB members are also invited to propose LHs that could be promoted via success stories and articles on the EU Ecolabel website.

BEUC/EEB will host a webinar on 23 May 2024 “Surfing green policies: opportunities for sustainable businesses”. BEUC/EEB is still looking for input speeches from a LH and invites EUEB members to propose suitable candidates. Additionally, EUEB members are invited to share the webinar invitation via their networks to LHs and potential LHs.

CB NL asked about the intended uptake by 5% in 2024 and how DG ENV will be able to measure if this uptake is due to communication activities. DG ENV confirms to aim for a 5% increase in both number of licences and products per year, which will be facilitated by the planned communication activities, but among other activities.

16:30 Closing, EC – President

The Chair thanked all participants and closed the meeting.

Next meeting

The next CB Forum and EUEB (online) meetings will take place on 26-28 November 2024.

Closed session (EUEB Members only)

16:20 – 16:30 Election of the EUEB President and Vice-President – EC, DG ENV

According to rules of procedure, since there were no candidates for the EUEB President and Vice-President positions, DG ENV will chair the EUEB for the next 2 years. DG ENV thanked the current President for the excellent work done in the past 4 years.

1. Participants list

Competent Bodies in presence:

Belgium: Federal Public Service Health, Food Chain Safety and Environment
Croatia: not represented
Cyprus: not represented
Czech Republic: Ministry of the Environment, Czech Environmental Agency (CENIA)
Denmark: Ecolabelling Denmark, Danish Ministry of Environment
Estonia: Ministry of Climate, Environment Agency
Finland: Ecolabelling Finland
France: ADEME, AFNOR
Germany: RAL gGmbH, German Environment Agency (UBA)
Greece: not represented
Hungary: HugaroMet Magyar Meteorologiai
Iceland: not represented
Ireland: NSAI
Italy: ISPRA
Latvia: not represented
Lithuania: Environmental Protection Agency
Malta: Standards and Metrology Institute
The Netherlands: SMK
Norway: Ecolabelling Norway
Poland: Polish Center for Testing and Certification
Portugal: Ministry of Economic Affairs
Romania: Ministry of Environment, Waters and Forests
Slovak Republic: Slovak Environmental Agency (SEA)
Sweden: Ecolabelling Sweden

Competent bodies online:

Austria: Austrian Consumer Association (VKI) - on behalf of Federal Ministry for Climate Action
Bulgaria: Ministry of Environment and Water
Luxembourg: Ministère de l'Environnement, du Climat et du Développement durable
Slovenia: Ministry of Environment, Climate and Energy
Spain: Ministerio para la Transición Ecológica y el Reto Demográfico; CB Comunidad Valencia; CB Cataluña

Stakeholders in presence:

A.I.S.E., BEUC, CEFIC, CEPI, The European Environmental Bureau (EEB), EFIC, ESBG, Eurocommerce, FEICA, IFRA, Plastics Recyclers Europe

Stakeholders online

Collaborating Centre on Sustainable Consumption and Production (CSCP), Eurométaux

Commission Services/contractors:

JRC, DG ENV, EU Ecolabel Helpdesk