

EU Environmental Footprint of Products – Cefic position

The European Chemical Industry Council (Cefic) has taken note of the initiative on the Environmental Footprint of Products and the development of technical guidance documents. It will be integrated into the Sustainable Consumption and Production/Sustainable Industry Policy (SCP/SIP) Action Plan, during its upcoming revision, under a “single market for green products” communication, by end 2012.

In terms of product environmental footprint, Cefic is concerned about the immediate applicability of this new methodology. If one of the main achievements of this methodology is comparability, we do not consider it workable in the absence of well-established rules (e.g. product category rules), reliable databases and mature and robust methodologies. When databases are completed and guaranteed for their reliability and confidentiality, the methodology could become acceptable for comparability purposes, if simplified.

Furthermore, considering that industry put a lot of efforts into finalising the studies in due time, industry would have liked to have been involved as a partner in the finalisation of the methodology. We also share the view that the methodology is not mature enough to achieve its goal.

Cefic considers that the methodology should be implemented as a voluntary scheme accompanied by a benchmarking per product category, preferably with stakeholders involvement. We also ask that impact categories be harmonised. In addition, if the methodology is adopted, we are keen to see harmonised and simplified software tools developed, so that improving existing instruments (e.g. ecolabel, eco-design) could become an option. Therefore, Cefic strongly believes that a permanent dialogue between stakeholders and the Commission will fundamentally improve the feasibility of the methodology and its implementation. Furthermore, consideration of performance criteria and socio-economic aspects should be taken into account as well.

Finally, Cefic would like to take this opportunity to stress that the Product Environmental Footprint methodology should be developed in order to guide consumers, to further enable competitiveness and innovation. It should not create additional burden for industry, especially for SMEs.

