

Brussels, 18 July 2014

ORGALIME RESPONSE: EVALUATION OF THE IMPLEMENTATION OF THE EU ECOLABEL SURVEY

Evaluation of the implementation of the EU Ecolabel

The European Engineering Industries represented by ORGALIME are committed to the continuous improvement of the environmental performance of the products manufactured by this industry. The sector is the main target industry of the Ecodesign and Energy Labelling Directives, for which implementation is ongoing for some 46 different product groups. The Ecolabel Regulation, which is to establish “a *voluntary ecolabel award scheme intended to promote products with a reduced environmental impact during their entire life cycle and to provide consumers with accurate, science-based information on the environmental impact of products*”, applies as a complementary tool on our sector. ORGALIME considers the voluntary nature of the eco label scheme important both for consumers and enterprises, the latter of which can choose to adopt the scheme if it indeed has the capacity to do so.

To date, the relevance of the EU Ecolabel in our sector remains limited. This is primarily due to:

1. **The lack of international recognition** – the EU Ecolabel is not always known or recognised on the international scene. Given that our sectors act on global markets, many companies prefer to adopt well established international standards, such as ISO or IEC, rather than the EU Ecolabel.
2. **The lack of competitive advantages** – public procurement in EU Member States insufficiently ties in with the EU Ecolabel, as well as with the Ecodesign and Energy Labelling requirements.

Indeed, so far the EU Ecolabel only applies to a selected number of product groups of our sector, such as heating/cooling systems, personal and notebook computers or light bulbs.

ORGALIME believes that the EU Ecolabel should remain a scientifically-based, voluntary instrument. The label criteria should be set at a level that allows preferably 20% but at least 10% of the market to reach the level. Moreover, the EU Ecolabel should not hamper the activities that are already taking place under the Ecodesign and Energy Labelling directives, but strive for consistency.

Orgalime’s detailed recommendations are specified hereafter:

Orgalime, the European Engineering Industries Association, speaks for 38 trade federations representing some 130,000 companies in the mechanical, electrical, electronic, metalworking & metal articles industries of 23 European countries. The industry employs some 10.3 million people in the EU and in 2012 accounted for some €1,840 billion of annual output. The industry not only represents some 28% of the output of manufactured products but also a third of the manufactured exports of the European Union.

www.orgalime.org

ANNEX: ECOLABEL SURVEY¹

Name and Contact Information (1st Name, Last Name, Email & Telephone)

In which country are you based? Belgium

What is your role?

Choose one of the following answers?

- Competent Body
- Government Body
- Business EU Ecolabel Licence Holder
- Business EU Ecolabel Non-Licence Holder
- Retailer
- NGO / Consumer / Trade / Industry Organisation
- Consumer

SECTION 1: AWARENESS OF POLICY

Question 1.1: Are you aware of the EU Ecolabel?

Possible answers:

A: Yes

B: No

Orgalime answer:

Yes.

Orgalime comment

No comment.

Question 1.2: Which of the following aspects of the EU Ecolabel are you aware of?

Possible answers:

A :Yes

B: No

Orgalime answer:

	<u>A</u>	<u>B</u>
The EU Ecolabel logo	X	<input type="checkbox"/>
Its aims and objectives	X	<input type="checkbox"/>
How to make an application	X	<input type="checkbox"/>
Product groups covered by the EU Ecolabel	X	<input type="checkbox"/>
Verification processes	X	<input type="checkbox"/>
Detailed criteria for particular product groups (please specify)	X	<input type="checkbox"/>
Other - please specify	<input type="checkbox"/>	<input type="checkbox"/>

Orgalime comment:

No comment.

Question 1.3: Are you aware of the following product policies/ tools at the EU level:

A :Yes

B: No

Orgalime answer:

	<u>A</u>	<u>B</u>
Ecodesign Directive	X	<input type="checkbox"/>
Energy labelling directive	X	<input type="checkbox"/>
Green Public Procurement	X	<input type="checkbox"/>

¹ The online survey can be accessed at <http://www.survey-ecolabel.eu/cms/>

Product Environmental Footprint	X	<input type="checkbox"/>
EU Organic Label	X	<input type="checkbox"/>
Other – please specify	X	<input type="checkbox"/>

WEEE directive², RoHS directive³, REACH Regulation⁴ and the F-Gases Regulation⁵.

Orgalime comment:

No comments.

Question 1.4: Are there any synergies between the EU Ecolabel and any of the following product policies/ tools:

A :Yes

B: No

Orgalime answer:

	<u>A</u>	<u>B</u>
Ecodesign Directive	<input type="checkbox"/>	<input type="checkbox"/>
Energy labelling directive	<input type="checkbox"/>	<input type="checkbox"/>
Green Public Procurement	<input type="checkbox"/>	<input type="checkbox"/>
Product Environmental Footprint	<input type="checkbox"/>	<input type="checkbox"/>
EU Organic Label	<input type="checkbox"/>	<input type="checkbox"/>
Other – please specify	<input type="checkbox"/>	<input type="checkbox"/>

Orgalime comment:

Orgalime is leaning towards answering “no” to all questions. Indeed, there could be synergies but improvements would be needed to exploit them.

Question 1.5: Are there any conflicts between the EU Ecolabel and any of the following product policies/ tools:

A :Yes

B: No

Orgalime answer:

	<u>A</u>	<u>B</u>
Ecodesign Directive	X	<input type="checkbox"/>
Energy labelling directive	<input type="checkbox"/>	<input type="checkbox"/>
Green Public Procurement	X	<input type="checkbox"/>
Product Environmental Footprint	X	<input type="checkbox"/>
EU Organic Label	<input type="checkbox"/>	<input type="checkbox"/>
Other – please specify	X	<input type="checkbox"/>

Orgalime comment:

REACH Regulation No 1907/2006 and sector specific chemicals legislation, RoHS Directive 2011/65/EU.

Question 1.6: Are there any areas where the EU Ecolabel and other product actions overlap?

Orgalime comment:

No comment.

² Directive 2012/19/EU, OJ L 197/38 of 24 July 2012

³ Directive 2011/65/EU, OJ L 174/88 of 1 July 2011

⁴ Regulation 1907/2006, OJ L 396/1 of 30 December 2006

⁵ Regulation 842/2006, OJ L 161/1 of 14.06.2006

SECTION 2: USE OF THE EU ECOLABEL

Question 2.1: Does your Organisation prioritise purchasing EU ecolabelled products or services?

A : Yes

B: No

Orgalime answer:

Not applicable.

Question 2.1.1 Do you purchase products or services with any other label or product certification?

Orgalime answer:

Orgalime's members operate both on the B2B and B2C level, and therefore some of our members might purchase products or services bearing the EU Ecolabel. Generally speaking, however, our members are more inclined to base their purchasing decisions on international standards, such as ISO or IEC.

Question 2.2: In your opinion, are the following topics drivers or direct benefits, for manufacturers and service providers adopting the EU Ecolabel?

Possible answers:

A: Benefit

B: Driver

C: A benefit and a driver

D: Neither

E: Don't know

Orgalime answer:

	A	B	C	D	E
Improve the competitiveness or market positioning of the product.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Respond to a specific request made by an important customer or retailer.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
Aim for/achieve increased sales.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pursue/achieve cost-saving opportunities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Obtain access to public procurement.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
To meet export market opportunities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Increase consumers/customers interest and satisfaction.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve relations/reputation with stakeholders.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve employee commitment to overall company environmental performance.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve management commitment to overall company environmental performance.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
Better management of a specific environmental issue for the company.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve overall company environmental performance.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
The EU Ecolabel improves the company organisational and managerial capabilities in the environmental area.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Better supply chain management and capabilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Promote product innovation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Improve product design and development.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Access to finance/insurance.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>

Orgalime comment:

The above mentioned aspects can be drivers for adopting the EU Ecolabel in general, however, today the benefits of the EU Ecolabel in our sector remains limited. In any case, the EU Ecolabel is not a driver for companies to take up environmental management but a tool supporting environmental commitments already taken up by companies.

Question 2.3: Do you think there are indirect benefits associated with the EU Ecolabel? Please indicate how strongly you agree or disagree with the following indirect benefits for the EU Ecolabel:

Possible answers:

A: Strongly agree

B: Agree

C: Neutral

D: Strongly disagree

E: Don't know

Orgalime answer:

	A	B	C	D	E
EU Ecolabel requirements/criteria set a benchmark for environmentally better performing products within the EU market.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
EU Ecolabel requirements/criteria are useful to manufacturers to provide indicators for what a "green product" is and what its performance should be for various environmental impacts, even if a company does not adopt the EU Ecolabel.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
EU Ecolabel requirements/criteria can be used by manufacturers as a guideline and a support for the product design process towards eco-innovation, even if a company does not adopt the EU Ecolabel.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
The EU Ecolabel is a useful guide for consumers to drive their choices towards the greenest products on the market	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
The EU Ecolabel criteria are a useful guide for companies who intend to develop green procurement strategies e.g. selecting suppliers on the basis of environmental criteria.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
The EU Ecolabel drives improvements in environmental performance of non-EU Ecolabelled products and services.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
When a company adopts the EU Ecolabel the level of awareness of environmental issues increases amongst the employees.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Job opportunities are created because companies using the EU Ecolabel hire new personnel with expertise and specific know how.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
The EU Ecolabel criteria support companies in making correct and effective environmental claims, helping to avoid "green-wash".	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
EU Ecolabel raises awareness of citizens that the EU sees environmental issues as a priority.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Other, please specify

Orgalime comment:

No further comment.

Question 2.4: In order to pursue the benefits associated with the EU Ecolabel, what actions do companies undertake or carry out? Please indicate how strongly you agree/disagree that companies carry out the following actions for promoting their EU Ecolabelled products:

Possible answers:

A: Strongly disagree

B: Disagree

C: Neutral

D: Agree

E: Strongly agree

F: Don't know

Orgalime answer:

	A	B	C	D	E	F
Advertising on TV, radio, press or other media (including street advertising).	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Advertising on new media (such as the web).	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Communication on the company website.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
Marketing "in-field" when participating in fairs, expositions, etc.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Direct communication to key-clients (e.g.: engagement in a workshop or other direct contacts).	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Communication within the supply chain (e.g. to suppliers).	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
External communication towards the stakeholders (e.g. press release, company newsletter, involvement of local authorities, communication with NGOs, etc.).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
Training and involving the sales personnel of the company to promote the EU Ecolabel with the (potential) clients.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Partnership with NGOs to promote the EU Ecolabel and/or the EU Ecolabelled products.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Commercial agreement or partnership with retailers to promote the EU Ecolabelled products on the shelf or in the point of sale.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Discounts or other special price-policies applied to the EU Ecolabelled products.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Increased budget for marketing the EU Ecolabelled products.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Others, please specify

Orgalime comment:

Marketing activities related to the Ecolabel varies greatly between individual enterprises according to their overall branding strategy and budgetary means. In some sectors, the Ecolabel might indeed be included in the marketing efforts.

Question 2.5: What are the main barriers and difficulties that firms experience with the EU Ecolabel? Please indicate how strongly you agree/disagree with the following barriers for the EU Ecolabel:

Possible answers:

A: Strongly disagree

B: Disagree

C: Neutral

D: Agree

E: Strongly agree

F: Don't know

Orgalime answer:

	A	B	C	D	E	F
Costs of adopting the EU Ecolabel (including costs of complying with the relevant criteria).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
In particular, the costs of the EU Ecolabel licence.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Too much documentation required/ too much "red tape".	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Complexity of documentation.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Requirements are too stringent.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Lack of human resources and competence within the company.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of technical and information support from outside the company.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of external incentives (including fiscal incentives or access to public procurement).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Lack of competitive rewards and advantages.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Lack of recognition by the stakeholders.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
Lack of recognition by the public institutions (including regulatory relief).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Lack of recognition at the international level.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Too difficult to communicate the EU Ecolabel to stakeholders and consumers (incl. use of the logo).	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Too many individual requirements (criteria).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
Requirements (criteria) are not addressing the most relevant environmental impacts.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Others, please specify

Orgalime comment:

Too stringent and often inconsistent requirements that do not allow relevant market coverage are in our view the main barrier. Orgalime believes that the criteria should be set as such that preferably 20% but at least 10% of the market can meet them. Its effect is also hampered, by its practical irrelevance on the international level, on which our sector operates.

SECTION 3: EU ECOLABEL AND OTHER NATIONAL LABELS**Question 3.1: Does your country have an ecolabel that covers any of the same product groups as the EU Ecolabel?****Possible answers:**

Yes

No

Orgalime answer:

In its nature of a European organisation, question is not targeted to us.

Orgalime comment:

National schemes vary in applicability and availability between Member States. In general, Orgalime favours one harmonised international label rather than multiple different national and/or regional labels.

SECTION 4: IMPACT OF THE EU ECOLABEL

Question 4.1

How has the EU Ecolabel performed over time? For example

- Increased overall number of EU Ecolabelled products on the market.
- The EU Ecolabel produced an increase of sales of greener products in general.
- Inclusion of the EU Ecolabel criteria in Public Procurement.

Do you have data that demonstrates these points? May we have access to this data?

Orgalime answer:

Overall, the Ecolabel has not had a significant impact (see above answers).

SECTION 5: MODEL / COSTS OF THE EU ECOLABEL

Question 5.1 Does the current business model of the EU Ecolabel work well? Please indicate how strongly you agree/disagree with the following sentences

Possible answers:

A: Strongly disagree

B: Disagree

C: Neutral

D: Agree

E: Strongly agree

F: Don't know

Orgalime answer:

	A	B	C	D	E	F
The time-span to obtain the EU Ecolabel should be shortened	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
The number of criteria should be limited, covering the main environmental impacts.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The time-span for the criteria development/revision process should be shortened	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The criteria development/revision process should be simplified whenever reliable science-based information on the environmental impact categories is already available.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
The transition period for existing licence holders to comply with the new criteria is adequate.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The scheme should cover a higher percentage of the market's products.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
The procedures of the Competent Bodies of different Member States need to be harmonised.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The fee structure is adequate.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The provision of reduced fees should be extended to other categories of beneficiaries.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The scope of the scheme should be extended to include more intermediate product groups.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The scope of the scheme should be extended to include food, feed and beverages product groups.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The marketing and promotional activities for the EU Ecolabel at the European level are adequate to stimulate the market for products with the Ecolabel.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The marketing and promotional activities for the EU Ecolabel at the national level are adequate to stimulate the						

market for products with the Ecolabel.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The promotion of the EU Ecolabel should be strengthened within GPP promotional initiatives.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Member States should provide more fiscal incentives to licence holders.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The European Commission should increase the level of integration of the EU Ecolabel in the existing EU legislation.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Others, please specify

Orgalime comment:

No comment.

Question 5.2 Would you recommend stopping the application of the EU Ecolabel in any of the product groups that are currently covered by the Scheme?

Please indicate which and give reasons.

Orgalime answer/comment:

A careful case by case assessment of the benefit of the Ecolabel should be made for product groups that fall under the Ecodesign and Energy Labelling Directives. Better consistency with requirements derived from these Directives as well as from EU chemicals legislation, notably REACH and RoHS, and more realistic EU Ecolabel requirements ensuring preferably 20% but at least 10% market coverage is a must for the EU Ecolabel's relevance in our sector in the future.

Question 5.3 Would you recommend including new product categories in the EU Ecolabel scheme?

Please indicate which products and give reasons.

Orgalime answer:

No.

Orgalime comment:

First, current implementation should be improved.

Question 5.4 Have you ever tried to quantify the whole cost of applying for the EU Ecolabel? If yes, can you provide figures for the first licence application and for the annual "maintenance" of the licence?

Orgalime answer:

No answer.

Orgalime comment:

No comment.

Question 5.5 How could these costs be reduced?

Orgalime answer:

No answer.

Orgalime comment:

No comment.

SECTION 6: FUTURE OF THE EU ECOLABEL

Question 6.1: Is the EU Ecolabel, and its set of common requirements, a valuable tool to facilitate a higher uptake and free circulation of green products (in the pursuit of a single market for green products) across Europe?

Possible answers:

A: Yes

B: No

Orgalime answer:

No answer

Orgalime comment:

The EU Ecolabel could become a more relevant tool to facilitate the free circulation of sustainable products across Europe. It is of vital importance, however, that the Ecolabel remains voluntary. A careful case by case assessment of the benefit of the EU Ecolabel should be made for product groups that fall under the Ecodesign and Energy Labelling Directives. Better consistency with requirements derived from these Directives as well as from EU chemicals legislation, notably REACH and RoHS, and more realistic Ecolabel requirements with preferably 20% but at least 10% market coverage is a must for the EU Ecolabel's relevance in our sector in the future.

Question 6.2: Is it beneficial to have a set of common requirements in the pursuit for a single market for green products across Europe in the form of the EU Ecolabel?

Possible answers:

A: Yes

B: No

Orgalime answer:

No (answer b).

Orgalime comment:

The EU Ecolabel is and should remain a product specific tool. For our sector, the Ecodesign and Energy Labelling Directives have established the necessary product policy framework.

Question 6.3: Overall, would you recommend retaining the EU Ecolabel as it is, changing it or abolishing the scheme?

Choose one of the following answers:

Possible answers:

A: Retain as is

B: Change

C: Abolish

Orgalime answer:

Retain as is (answer a).

Orgalime comment:

Orgalime finds that the Ecolabel should remain a scientifically based, voluntary tool, the requirements of which should be able to be met by preferably 20% but at least 10% of companies. Its implementation needs to be improved.