

EUROPEAN COMMISSION INCEPTION IMPACT ASSESSMENT ON THE LEGISLATIVE PROPOSAL ON SUBSTANTIATING GREEN CLAIMS

A.I.S.E. input

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A.I.S.E. welcomes the work initiated by the European Commission to strengthen consumer protection against commercial practices that are contradictory to the Green Deal and especially to the new Circular Economy Action Plan objectives, e.g. false and not substantiated product claims.

A.I.S.E. calls for measures that are:

- based on sound science and in consideration of impacts across the full life cycle of the product and its packaging;
- developed in a consistent and coherent way with existing legislation.

A.I.S.E. recommends to consider “Option 1” (ie. update the 2013 recommendation) as a policy option. Indeed, PEF is not deemed mature enough at this stage to support Option 2 and more evidently Option 3.

Moving to a more harmonised approach for providing reliable environmental information, increasing simplification and reduction of administrative burdens

In principle, A.I.S.E. supports the proposal to substantiate environmental claims through PEF/OEF and to update the 2013 Commission Recommendation on the use of common methods to measure and communicate the life cycle environmental performance of products and organisations (2013/179/EU) based on the outcome of the 2013-2018 pilot phase (listed as option 1 in the inception impact assessment).

Learnings from A.I.S.E.’s official PEF project on household liquid laundry detergents (2013-2019) are that the PEF/OEF method is judged overall as moving into the right direction as it is intended to evaluate and reduce the environmental footprint, based on a European-wide harmonised LCA-based approach. However, it is not yet sufficiently mature, especially to provide accurate product comparable information to consumers for sustainable purchase decisions; for that reason, A.I.S.E. recommends to NOT disclose individual quantitative PEF results to consumers. LCA science is still evolving and impact methods are too complex for consumers to understand (see attached report on A.I.S.E.’s PEF communication research and www.aise.eu/pef). However, in case a company wants to apply claims on its product, a PEF study may help to substantiate whether a claim is relevant and not misleading but it should not be mandated in view of the PEF limitations and when similar scientifically sound assessments are availability for this purpose (e.g. ISO compliant LCA studies).

In addition, product and packaging eco-design and sourcing based on PEF can positively influence the environmental impact. In a B2B context, it can be helpful to use PEF results to inform retailers and customers on relevant life-cycle stages, impact categories, processes and measures taken by manufacturing companies.

Proliferation of sustainability logos and claims

A.I.S.E. agrees in principle on the objective to reduce the number of logos and claims, when those are not substantiated by science and/or life cycle based. However, there can be good reasons for the co-existence of different schemes, especially when those complement each other – like the EU Eco-label and the Charter for Sustainable Cleaning in our industry sector. Whereas the EU Eco-label is targeting the best environmentally performing products, the Charter for Sustainable Cleaning is a more comprehensive framework that is already operational to all products, including a comprehensive company dimension, advanced sustainability product standards (9 product categories) and a monitoring system (for details see www.sustainable-cleaning.com):

- Charter product standards are LCA and science-based, addressing the most relevant environmental impacts. Products fulfilling those product standards are authorised to carry a specific Charter product logo, enabling consumers for sustainable purchase decisions.
- Independent third-party verification guarantees that all companies are individually assessed on the same basis.
- Over the last 15 years, A.I.S.E. can demonstrate sustainability progress for the whole industry sector in Europe. For instance, in Europe the industry sector has reduced GHG emissions by 44% since 2006 and 2019 (see attached Charter KPI commentary).
- Due to the importance of the use phase, consumer engagement is key. Reduction of carbon footprint (addressed via low temperature washing advice) and other good consumption behaviours are relevant. A.I.S.E. recommends common best use tips for consumers (Our industry has developed common and harmonised best use tips for several product categories; see www.cleanright.eu).

