Questionnaire NGOs

Fields marked with * are mandatory.

This questionnaire is targeted at NGOs.

There are other questionnaires available, targeted at:

- Business and sectoral/business associations - https://ec.europa.eu/eusurvey/runner/2e0b50c6-cb80-7c41-af6d-cf9e7fa4a501
- Public administrations and international organisations - https://ec.europa.eu/eusurvey/runner/093d8fba-e2cd-8732-d2ce-5c273ae96ae5
- Method/initiative owners - https://ec.europa.eu/eusurvey/runner/efe2a9a6-3f2c-fc54-5781-86dfe198ce72
- Investors and financial institutions - https://ec.europa.eu/eusurvey/runner/cf4ab21c-e97a-d0cd-4490-94254d858870

A public consultation on a product policy framework for the circular economy will also be available soon. It will also include a section on the future use of the Environmental Footprint method.

Introduction

In 2013, the European Commission adopted the Product and Organisation Environmental Footprint (PEF and OEF) methods, recommeding public and private organisations to use them for measuring and communicating the life cycle environmental performance of products and organisations[1].

In adopting this Recommendation, the objective of the European Commission was to overcome the fragmentation of the internal market as regards different available methods for measuring environmental performance.

Based on the methods, the European Commission started a pilot phase in order to test:

- the development of product group and sector-specific calculation rules (Product Environmental Footprint Category Rules and Organisation Environmental Footprint Sector Rules) through a process open to any stakeholder;
- the development of benchmarks: this corresponds to the environmental performance of the average product/ organisation on the market and is the starting point for comparing between similar products and organisations;

- approaches to verify Environmental Footprint information;
- approaches to communicate Environmental Footprint information to consumers and to other company stakeholders (e.g. business partners, investors, NGOs, etc.).

The aim of the rules is to provide a clear set of instructions for calculating the Environmental Footprint profile that guarantees reproducibility and comparability between similar products (the benchmarking of organisations is more complicated and requires very specific situations in order to be meaningful). They are based on the principle of relevance: the rules pre-define the environmental issues that are most relevant for the given product group or sector and ensure the high quality of the analysis of these issues.

The pilot phase involved 24 product groups[2] and two sectors[3], with more than 260 leading companies and other stakeholders. Most of the pilots represented more than 2/3 of the EU market for the given product or sector. More than 2000 stakeholders followed the process and several of them took the opportunity to comment on milestone documents of the pilots.

A technical evaluation of the pilots has confirmed the importance of having clear product group and sector-specific rules. A comparison of environmental performance proved to be feasible for final products: it is possible to determine whether the performance of a product is better or worse than the average product on the market (benchmark)[4].

This became possible due to the agreements on technical issues reached during the pilot phase (e.g. modelling of cattle, packaging, end of life/ recycling/ recovery, etc.) and to the use of a single set of high quality secondary (average) data. As a further action to enhance access to the methods, these data are going to be made available for free to any user of the product group and sector-specific rules until 2020.

The testing of verification approaches suggested a combination between on-site and remote audits and a focus on data that have the most impact on the final results, which are mostly data owned by the companies[5].

A wide range of tests were also carried out by the pilot participants and the European Commission on how to communicate Environmental Footprint information. Many of the tests re-confirmed a high interest in environmental information in general, and Environmental Footprint information specifically. The issues to tackle include the difficult balance between complete and accurate information on the one hand and a need for simplicity and clarity on the other[6].

The European Commission is currently evaluating potential ways forward for the application of the PEF and OEF in existing or new policies. This public consultation aims to gather views on possible options for the further use of these methods and to collect evidence and opinions on underlying issues related to environmental information and green markets.

Potential policy options could include the integration of the Environmental Footprint methods into existing voluntary policies such as the EU Ecolabel and Green Public Procurement; or the development of a new, stand-alone instrument implementing the methods. The tool also has the potential to support the implementation of the Action Plan on Sustainable Finance. Among the potential applications, it is possible to envisage a role for the PEF and the OEF to help define a taxonomy for sustainable finance (i.e. a classification of sustainable economic activities)[7] and as a basis for developing low carbon benchmarks and positive carbon impact benchmarks[8].

More background on the environmental footprint can be found in the document below.

Background_EF.pdf

[1] European Commission Recommendation 2013/179/EU, http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32013H0179

[2] Batteries and accumulators, decorative paints, hot and cold water supply pipes, household detergents, intermediate paper product, IT equipment – storage, leather, metal sheets, footwear, photovoltaic electricity generation, thermal insulation, t-shirts, uninterruptible power supply, beer, dairy, feed for food-producing animals, olive oil, packed water, pasta, pet food and wine.

[3] Copper production and retail.

[4] See a detailed analysis in the document "Technical evaluation of the EU Environmental Footprint pilot phase, http://ec.europa.eu /environment/eussd/smgp/pdf/HD_pilot_eval_final.pdf (document available only in English)

[5] Final report on the testing of verification approaches during the Environmental Footprint pilot phase, http://ec.europa.eu/environment /eussd/smgp/pdf/2017_EY_finalrep_verification_public.pdf (document available only in English)

[6] F Final report on the assessment of different communication vehicles ofr providing Environmental Footprint information, http://ec.europa. eu/environment/eussd/smgp/pdf/2018_pilotphase_commreport.pdf

[7] See the proposal for a Regulation on the establishment of a framework to facilitate sustainable investment, COM(2018) 353 final

[8] See the proposal for a Regulation amending Regulation (EU) 2016/1011 on low carbon benchmarks and positive carbon impact benchmarks, COM(2018) 355 final

A. Information on the respondent

* I am giving my contribution as

Environmental organisation

* Please provide your full name.

150 character(s) maximum

Lindsey Wuisan

* Please provide your e-mail address.

lindsey.wuisan@ecostandard.org

If responding on behalf of an organisation, association, authority, company, or body, please provide the name.

150 character(s) maximum

European Environmental Citizens Organisation for Standardization

* Where are you based?

Belgium

* Publication privacy settings

The Commission will publish the responses to this targeted consultation. You can choose whether you would like your details to be made public or to remain anonymous.

○ **Anonymous**
Only your type, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

● **Public**
Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

Respondents should not include personal data in documents submitted in the context of the consultation if they opt for anonymous publication.

Please note that, whatever option chosen, your answers may be subject to a request for public access to documents under Regulation (EC) N°1049/2001. Please also read the specific privacy statement referred to on the consultation webpage.

Please also read the specific privacy statement which can be downloaded below.
Consultations_ps_en.pdf

*Is your organisation or institution registered in the EU Transparency Register? (relevant for companies, industry organisations, NGOs, consumer groups, research organisations and other).
● Yes
○ No
○ Do not know

* Please provide your Register ID number
Click below to view the EU Transparency Register
http://ec.europa.eu/transparencyregister/public/consultation/search.do?locale=en&reset=
300 character(s) maximum

9666809365133

*Organisation size

Small (10 to 49 employees)

*Please specify the focus of the activity of the NGO you represent.
○ Consumers
● Environment
○ Other

*Where are you active?
○ Local
○ Regional
○ National
○ EU
● Worldwide

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B. Questionnaire on the Future use of Environmental Footprint

B.1. Input on the importance of environmental information

To what extent do you agree with the following statements in terms of environmental information on products and organisations?

	Strongly agree	Agree	Undecided	Disagree	Strongly disagree
* There are too many methods on the environmental performance of products	○	●	○	○	○
* There are too many labels on the environmental performance of products	○	●	○	○	○
* There are too many methods on measuring companies' environmental performance	○	●	○	○	○
* There are too many reporting initiatives on the environmental performance of companies	○	●	○	○	○
* Companies should apply environmental criteria when choosing their suppliers	●	○	○	○	○
* Companies should measure their environmental performance	●	○	○	○	○
* Not enough information is available on the environmental performance of products / organisations	○	○	●	○	○
* I prefer to work with financial institutions (e.g. banks) that have a good environmental reputation	○	●	○	○	○
* Investors and banks should apply environmental criteria when deciding where to invest	●	○	○	○	○
* I think consumers care more and more for environmental performance	●	○	○	○	○

What importance do you give to the following types of environmental information on products?

	Very important	Quite important	Less important	Not important	No opinion
* Information directly linked to the product (e.g. environmental impacts of ingredients, packaging, energy use etc.)	●	○	○	○	○

* Production type (e.g. organic, covered by environmental management system)	◉	○	○	○	○
* Information considering all environmental impacts of the product during its whole life cycle (resources, manufacturing, transport, use, waste or recycling, etc.)	◉	○	○	○	○
* Information on a single relevant environmental issue (e.g. climate change)	○	○	◉	○	○
* The most relevant environmental impacts for the product (those cumulatively contributing to 80% of the total impact	○	○	◉	○	○
* Information on the environmental performance of the product in comparison to the performance of the average product on the EU market (e.g. better, average, worse)	○	○	○	○	◉
* Information pointing to environmentally excellent products, so as to choose the best products (e.g. through ecolabels such as the EU Ecolabel)	◉	○	○	○	○

B.2. Input on experience with environmental information

Misleading green claims

* Did you ever encounter a label or environmental information that you would qualify as misleading?
- ◉ Yes
- ○ No

* Please specify or give an example

300 character(s) maximum

> Environmental information on a product can be misleading when inaccurate or when not relevant (see annex)

* Did you file a complaint?
- ○ Yes
- ◉ No

* In my experience…
- ○ … most of the environmental claims are false
- ◉ … many environmental claims are false
- ○ … some environmental claims are false
- ○ … environmental claims are correct

○ I don't have an opinion

Comments (if you have an idea of what % of environmental claims are false, please add it here)
300 character(s) maximum

[ ]

* Do you think that the availability of reliable, comparable environmental information would trigger more growth on green markets?

◉ Yes
○ No
○ I don't know

* In your experience, do companies with a sound environmental strategy perform better economically?

◉ Yes
○ No
○ I don't know

* In your opinion, which sectors have the highest potential of growth for products with better environmental performance? (multiple answers possible)

☑ Agriculture
☑ Apparel & footwear
☑ Banking
☑ Chemicals
☑ Construction products
☑ Electrical & electronics
☑ Forestry
☑ Food and beverages
☑ Insurance
☑ Materials (e.g. metals, plastics)
☑ Retail & wholesale
☑ Tourism
☑ Other

* Please specify other.
150 character(s) maximum

transport and mobility, food services

* Do you experience growing demand from your customers for greener products?

◉ Yes
○ No
○ Don't know

B.3. Use of the Product and Organisation Environmental Footprint methods (PEF and OEF)

* Please select the statement(s) that applies to you. (multiple answers possible)

- ☐ I (or my organisation) was member of one of the Technical Secretariats developing Product Environmental Footprint Category Rules or Organisation Environmental Footprint Sector Rules during the EU Environmental Footprint Pilot phase
- ☐ I (or my organisation) followed the EU Environmental Footprint pilot phase as a stakeholder
- ☑ I am aware of the EU Environmental Footprint pilot phase but was not involved
- ☑ I know about Life Cycle Assessment
- ☐ I am not aware of this work

The Product Environmental Footprint method has new features respectively to traditional Life Cycle Assessment. Please tell us to what extent you consider these useful or not.

	Very useful	Quite useful	Neutral	Less useful	Not useful at all
* Product Environmental Footprint Category Rules pre-identify most relevant environmental impacts, processes and life cycle stages for the product group	○	●	○	○	○
* Primary data gathering is focussed on a limited number of specific processes	○	○	●	○	○
* Data quality requirements vary based on environmental relevance and access to data	○	○	●	○	○
* Product Environmental Footprint Category Rules list secondary data to be used	○	●	○	○	○
* Secondary data are available for free to users of Product Environmental Footprint Category Rules	●	○	○	○	○
* The environmental performance of the average product on the market (representative product/ benchmark) is stated in the Product Environmental Footprint Category Rules	○	●	○	○	○
* It is possible to compare the Environmental Footprint profile of the product with the benchmark	○	●	○	○	○

B.4. Input on the potential use of the Product and Organisation Environmental Footprint (PEF and OEF) methods for providing environmental information

Who should have an important role in ensuring the availability of reliable environmental information on products and organisations?

	Very important	Quite important	Less important	Not important	No opinion
* European Union	●	○	○	○	○
* Member States (countries)	●	○	○	○	○

	Very important	Quite important	Less important	Not important	No opinion
*NGOs	●	○	○	○	○
*Private sector	●	○	○	○	○
Other	●	○	○	○	○

Please specify other.

150 character(s) maximum

research institutes & universities

How important do you rate the following elements for providing reliable, comparable and comprehensive environmental information?

	Very important	Quite important	Less important	Not important	No opinion
*Product group and sector-specific calculation rules (e.g. how to calculate the environmental performance of clothing)	●	○	○	○	○
*Availability of a benchmark (performance of the average product) per product group	○	●	○	○	○
*Availability of a metric that allows to compare companies' environmental performance within a sector	○	●	○	○	○
*Clear rules on how to develop product group and sector-specific calculation rules	●	○	○	○	○
*Requiring the gathering of primary data for specifically defined processes that are most relevant from an environmental point of view and where primary data can be accessed	●	○	○	○	○
*Availability of common, free average (secondary) data	●	○	○	○	○
*Calculation tools enabling non-experts to carry out the analysis	●	○	○	○	○
*Use of a solid verification system	●	○	○	○	○

Who should develop EU-wide product group and sector-specific rules?

	Best	Good	Less appropriate	Worse	No opinion
*The private sector, with input from stakeholders	○	○	○	●	○

*The private sector, supervised by the European Commission and with input from stakeholders	○	○	●	○	○
*Standardisation organisations (e.g. European Committee for Standardisation), based on EU rules	○	○	●	○	○
*The European Commission, with input from the private sector and other stakeholders	●	○	○	○	○
Other	○	○	○	○	○

Who should bear the cost of providing free average (secondary) data to use in Environmental Footprint measurement?

	Best	Good	Less appropriate	Worse	No opinion
*The European Commission	○	○	●	○	○
*The private sector	●	○	○	○	○
*Co-funded by the European Commission and the private sector	○	○	●	○	○
*It is not important to provide free secondary data	○	○	○	●	○

What actions related to the Product Environmental Footprint method (PEF) would be effective to trigger the uses of environmental information you consider important?

	Very effective	Effective	Slightly effective	Not effective at all	No opinion
*The European Commission encourages the use of the Environmental Footprint methods for measuring and communicating environmental information on a voluntary basis	○	○	●	○	○
*Delegate the management of a voluntary Environmental Footprint scheme to a 3rd party	○	○	●	○	○
*Prescribe the use of the PEF in case communicating environmental information (it is not mandatory to communicate environmental information, but if communicated, the information has to rely on the PEF method)	○	●	○	○	○
*Prescribe the use of the PEF for measuring and communicating life cycle environmental performance	○	●	○	○	○

	Very effective	Effective	Slightly effective	Not effective at all	No opinion
*Use the PEF in the development of EU Ecolabel criteria	○	○	●	○	○
*Use PEF benchmarks (performance of the average product) as thresholds to access the EU Ecolabel scheme	○	○	○	●	○
*Use PEF information to demonstrate compliance with the EU Taxonomy of Sustainable Investments.	○	○	○	○	●
*Use PEF for defining Green Public Procurement criteria	○	○	●	○	○
*Use PEF benchmarks as thresholds for accessing Green Public Procurement	○	○	○	●	○
*Use PEF information to check the accuracy of environmental claims when applying the Unfair Commercial Practices Directive	●	○	○	○	○
*Provide requirements on how to communicate on the Environmental Footprint (it is not mandatory to communicate environmental information, but if communicated, these have to comply with specific requirements)	○	●	○	○	○
*Create an EU repository of PEF results for products (participation voluntary or mandatory depending on the policy)	○	●	○	○	○
Other	○	○	○	○	○

What actions related to the Organisation Environmental Footprint method (OEF) would be effective to trigger the uses of environmental information you consider important?

	Very effective	Effective	Slightly effective	Not effective at all	No opinion
*The European Commission encourages the use of the Environmental Footprint methods for measuring and communicating environmental information on a voluntary basis	○	○	●	○	○
*Delegate the management of a voluntary Environmental Footprint scheme to a 3rd party	○	○	●	○	○
*Use OEF indicators in the EU Eco-Management and Audit scheme (EMAS) reporting	○	○	○	●	○

* Promote more harmonised reporting based on (but not limited to) the OEF for the environmental pillar of non-financial reporting	◯	⦿	◯	◯	◯
* Provide an EU registry of OEF results for companies (participation voluntary or mandatory depending on the policy)	◯	⦿	◯	◯	◯
* Create an EU rating scheme for environmental performance of companies, based on (but not limited to) the OEF	◯	◯	⦿	◯	◯
Other	◯	◯	◯	◯	◯

* Do you think there should be specific provisions for SMEs? (multiple answers possible)

☐ Micro companies should be exempted from legislative requirements
☑ Calculation tools for non-experts should be available
☐ No specific provisions are necessary
☐ Other

Please specify who should develop these calculation tools?

	Best	Good	Less appropriate	Worse	No opinion
* The European Commission	◯	⦿	◯	◯	◯
* Public administrations, coordinated by the European Commission	◯	◯	◯	⦿	◯
* Sectoral/trade associations	◯	◯	⦿	◯	◯
* Individual businesses (free market of tools)	◯	◯	◯	⦿	◯
Other	◯	◯	◯	◯	◯

* Do you think that the European Commission should work on specific strategic sectors?

◯ Yes, based on potential environmental impact
◯ Yes, based on importance for the EU economy
◯ Yes, based on importance for capital markets (e.g. market capitalisation of a sector) and/or financial stability
⦿ Yes, based on a combination of factors (environmental impact and importance for the EU economy)
◯ The decision should be left to industry
◯ I don't know/ no opinion

* Do you think that the scope of the EU Ecolabel should be extended to food, feed and drinks?

◯ Yes
⦿ No
◯ I am not sure

*Please explain your choice.

300 character(s) maximum

> Ecolabel could be applied to some food/catering and restaurant services, but should not be applied to individual products because it is more effective to strengthen/expand organic certification schemes/logos which are already established and widely recognised (further info in annex).

What communication requirements related to environmental information would be most effective in your opinion for products?

	Very effective	Effective	Slightly effective	Not effective at all	No opinion
*Defining and monitoring compliance with communication principles	○	●	○	○	○
*Fines for breaching communication principles	○	●	○	○	○
*Prescribe minimum information content, without prescribing the format	○	○	○	●	○
*Prescribe a format for communicating to consumers (to use e.g. on a label, on-shelf information, online etc.)	○	●	○	○	○
*Prescribe a format for communicating to business partners	○	●	○	○	○
*Encourage to transfer PEF information along the supply chain (e.g. through barcodes)	○	●	○	○	○
*Mandatory verification (communicating information is voluntary, verification is mandatory)	●	○	○	○	○
Other	○	○	○	○	○

Which of the following approaches to verification should be used with reference to information produced based on PEF/OEF methods?

	Strongly disagree	Moderately disagree	Moderately agree	Strongly agree	Don't know /No opinion
*No need for verification, self-declarations are sufficient	●	○	○	○	○
*Member States should be responsible for monitoring that the information communicated complies with the requirements	○	○	●	○	○

* An independent third party (whose costs are covered by who is producing the information) should verify the information meets requirements before it is communicated	○	○	○	●	○

* Where should Product Environmental Footprint information on products be available?

- ○ Only directly on the product (e.g. on a label)
- ○ Near the product (e.g. on shelf, leaflet provided with the product)
- ● Only online (e.g. linked to the product with a QR code or barcode)
- ○ On or near the product and online
- ○ Other
- ○ No opinion

What communication requirements would be most effective in your opinion for organisations (e.g. companies)?

	Very effective	Effective	Slightly effective	Not effective at all	No opinion
* Prescribe minimum information content, without prescribing the format	○	○	○	●	○
* Prescribe a reporting format	○	●	○	○	○
Other	○	○	○	○	○

Please provide any further comments, explanations or suggestions (for example other measures to improve the availability and comparability of environmental information).

Click here to upload a position paper.

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Contact

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