



Brussels, 25 November 2020

## Tender Specification Behind the labels on plastic products

### Background

ECOS promotes and defends environmental interests in the development of standards at European and international level, as well as in the development of technical environmental product policies. As part of our work, we aim to promote transparency of environmental information and green claims on consumer products.

As a response to the growing consumer awareness of the environmental impacts of plastic products, businesses and brands are increasingly using sustainability labels and making green claims on consumer products. Numerous studies showed that the multiplication of labels and claims on plastic products is likely to confuse consumers and facilitate misleading or even false environmental claims.

As part of the 2020 Circular Economy Action Plan (CEAP) the Commission highlights the importance of trustworthy information found on consumer products, and 'will also consider further strengthening consumer protection against green washing (...), setting minimum requirements for sustainability labels/logos and for information tools'.

The CEAP also identifies plastics as one of the priority sectors to be tackled to support the transition to a circular economy.

Since the 1950's, the consumption of plastics worldwide was multiplied by over than 200, reaching 359 in 2018. Global plastic consumption is expected to be multiplied by 3 by 2050. As plastic consumption is increasing, so is plastic pollution. Plastics are widely used in single-use and short-term applications (single-use plastics account for around 40% of plastics produced), which exacerbated our throw-away culture and shed light on our incapacity to deal with plastic waste globally.

### Objective of this tender

ECOS seeks to commission a study exploring the use and meaning of labels used on plastic products worldwide. With this work, ECOS intends to assess the relevance, credibility, comparability, and understanding among consumers of these labels and environmental claims. This assessment will enable ECOS to debunk typical misleading and false claims found on plastic products, and make recommendations for an effective, trustworthy communication to consumers in order to better protect and empower them.

This study is intended to provide contribution to the implementation of the European Commission's CEAP, inform partners part of the 'Break Free From Plastic' movement and the Plastic Solutions Fund, and help ECOS to develop recommendations to product manufacturers.

## Scope

The study will focus on fast moving consumer goods, sporting labels, marking and claims directly targeting consumers and meant to influence their choices (for instance on the packaging of these products).

The study will focus on the most widespread applications of plastics for consumer goods: packaging (accounting for 42% of plastics globally<sup>1</sup>) and textiles (17,5%). Plastics used in the building and construction sector (19%) are not listed in here as they are usually bought and installed by businesses, communication is therefore mostly B2B. Therefore, as a first step, the contractor will have to propose a selection of products.

Many studies<sup>2</sup> have already focused on specific sustainability labels, comparing them without looking at other aspects of the products such as: where they are on the product?, how is the product otherwise marketed?, what product is it?, to what extent the label is relevant to this specific product?, etc. Therefore, in order to provide a good understanding of marketing strategies, the analysis will focus on products, overall, rather than on the sole labels and markings sometimes lacking more context.

The study will focus on plastic products and their marketing strategies on 3 continents, to be chosen by the contractor. The contractor will highlight the main similarities across regions as well as the main regional differences, as to the type of products placed on the market and the type of environmental information found on the product. For instance, detergents can be sold in portion-sized bottles and sachets in South-East Asia, while quantities are larger in the EU. Packaging sometimes affects claims, and these differences need to be accounted for.

## Process

We propose that the process have three distinct steps:

### 1. List of products to analyse

The contractor will first select the consumer products to be analysed. Instead of carrying out a study solely listing existing labels and environmental claims, the study will first identify the plastic articles of interest for the study. Criteria for selecting these products can be as follows:

- plastic articles most often littered (by article or by brand) according to beach count data;
- single-use plastic articles for which well-known reusable alternative exist;
- products from famous brands commercialised worldwide;
- plastic items most commonly used in specific regions;
- market data to assess specific product characteristics such as recycled-content, bio-based content, recyclability, reusability, biodegradability, etc. For instance, if the focus is on biodegradability, market data on the proportion of biodegradable products in a specific product category can be a selection criterion.

<sup>1</sup> <https://ourworldindata.org/plastic-pollution#which-sectors-produce-the-most-plastic>

<sup>2</sup> One recent example is the study carried by the One Planet Network 'Can I Recycle This ?', [https://www.oneplanetnetwork.org/sites/default/files/uneq\\_ci\\_2020\\_can\\_i\\_recycle\\_this.pdf](https://www.oneplanetnetwork.org/sites/default/files/uneq_ci_2020_can_i_recycle_this.pdf)

The selected products should cover the 2 and preferably all 3 among the following regions:

- European Union
- North America
- (South East) Asia

This list should cover a minimum of 20 plastic items, and will be drawn up in agreement with ECOS.

## 2. Critical assessment of labels and green claims found on the selected items

The contractor will then critically assess all the markings, labels, and environmental information displayed on the short-listed plastic items.

As part of this assessment, the contractor will explain what such labels and claims entail, and criteria to be fulfilled in order for products to bear those marks.

ECOS is particularly interested in the following aspects:

- Is this claim environment-related, and if so how?
- What are the environmental criteria covered?
- How are these measured?
- Are definitions of key terms clear cut (for instance, if related to recycled-content, is it clear whether made from post-consumer waste only or is pre-consumer waste also covered)?
- What does the verification process entail before the label or claim is put on the product?
- To what extent does the claim reflect the actual practice?
- Can consumers likely misunderstand the label or the claim?
- Are there key aspects overlooked by the label or which the claim does not cover (and which could result in greenwashing)?

Special attention will be paid to the use of environment-related terminology, such as 'natural', 'bio-', 'earth-friendly', 'eco-', etc. as well as sustainability labels and claims regarding end-of-life properties (biodegradable, compostable, recyclable); feedstock (bio-based, recycled-content); and the overall environmental impact (carbon or water footprint). Real-life example of labels, marking and environmental information which ECOS is interested in can be found in Annex I.

## 3. Policy recommendations and asks

Following feedback from ECOS and Rethink Plastic Alliance partners, final recommendations will be agreed upon. The recommendations are required to be as specific as possible, and should include concrete asks in terms of:

- Environmental communication
- Restrictions on specific environmental claims deemed misleading
- Aspects currently not covered by communication tools to consumers, but which should be
- Identifying good practice

## Project implementation

Delivery of the analysis will involve active contribution from and regular coordination with ECOS. The key milestones of the projects include:

- A kick-off meeting (most probably online)
- An interim meeting
- An online final meeting

Throughout the implementation of the project, contractors will prepare at least:

- An inception report (around 10 pages, presenting the structure of the report and a methodology to identify the plastic items included in the study, to send to ECOS ahead of the kick-off meeting)
- An interim report (to send to ECOS ahead of the interim meeting)
- And a draft final report (to send to ECOS ahead of the final meeting)

After each report, consultation with ECOS partners will take place.

## Outputs

The contractor will deliver a report:

- Following this structure:
  - Introduction
  - Methodology to determine the list of focus products
  - Critical assessment of labels and claims on focus products
  - Recommendations
  - Conclusions
- ECOS expects this report to be as visual as possible, including figures, real-life pictures, and labels.
- Contractors will provide when possible and relevant key facts and figures to ECOS to be used in communication materials (such as infographics, and visual representations).
- The length of the report should not exceed 50 pages (excluding references and annexes)

The tenderer will assign to ECOS the exclusive right to own and use the outputs of this study. The authors will be acknowledged in the published ECOS report.

## Tender preparation

Tenderers are requested to submit a proposal by **23:59 CET 28 November 2020** outlining:

- A brief description of the tenderer's understanding of the analysis demanded.
- A description of the anticipated activities to achieve the desired analysis.
- A description of how close coordination with ECOS will be ensured throughout the project.
- A description of the proposed outputs, including a draft structure for the full report.
- A detailed timeline on milestones and deadlines.

- Budgeting for each element of the work.
- Biographies and time availability of the key staff delivering the work, as well as their areas of expertise, as well as references if available.

Note that sub-contracting is accepted in cases where a delivery team involves individuals from different institutions or organisations. In this case, the lead tenderer retains responsibility for legal and financial arrangements for any sub-contracting.

## Budget

The budget available for this work is maximum €16,500 (excl. VAT), and all other costs will be incurred by the subcontractor. The table below provides an indication of percentage of time against the headlines of the different activities.

Activity	Indicative %
<b>1. Analysis</b>	
<i>1. Methodology to select plastic items and short list</i>	<b>20</b>
<i>2. Critical assessment of environmental-related terminology, labels and claims</i>	<b>30</b>
<i>3. Recommendations &amp; asks</i>	<b>15</b>
<b>2. Outputs</b>	<b>15</b>
Report	
<b>3. Management</b>	<b>10</b>
Project management (including meetings, regular coordination with ECOS, discussion of comments provided by ECOS and travel)	

## Timeline

The study should be published by the **end of March 2021**. Therefore, the final report should be provided by end February 2021. A kick-off online meeting will be held with the successful applicant(s) in the month of December, depending on the management team and contractor's availability.

## Tender Assessment

Assessment of the tenders will be made by an appointed selection committee, using a pre-agreed evaluation template. The award criteria are:

- 70% quality:
  - delivery team expertise (CVs + relevant experience to be provided) and efficient coordination with ECOS,
  - relevance of application,
  - usefulness of the expected outcome for communication
- 30% price

Only short-listed tenderers will be contacted.

**Tenderers are requested to submit a proposal by 28 November 2020 23:59 to [info@ecostandard.org](mailto:info@ecostandard.org) (with copy to [mathilde.crepy@ecostandard.org](mailto:mathilde.crepy@ecostandard.org))**

## Annex I – Real life examples of ‘environmental-related’ information

We are looking for the following type ‘environment-related’ information on products:

### Environment-related labels

Environment-related labels are an image, or a sign placed on a product to inform consumers or businesses. Information might be a legal obligation (for instance sorting instructions), certification schemes (national/regional ecolabels), trademarks (plant bottle), etc.

ECOS will carry out an in-depth analysis of the meaning of the labels, the criteria needed to be fulfilled to use the label and the awarding process to that label (self-marking or third-party certification).

These are a few examples of labels used on plastic products:



### Environment-related claims:

Environment-related claims (also ‘green claims’) are assertions made by companies about the environmentally beneficial characteristics of their goods and services. They can refer to the way the products were produced, packaged, distributed, consumed, and/or disposed of. These claims are sometimes supported by labels, by certification schemes, sometimes substantiated, sometimes not.

We are particularly interested in any environment-related assertion with a marketing purpose. Examples of such claims usually contain the following words:

- Natural
- Pure
- Eco-
- Green
- Clean
- Earth-friendly
- Bio-

- Good for the environment
- Sustainable
- Recyclable
- Recycled content
- Biodegradable
- Reusable
- Refillable
- Made from waste
- x% better/less carbon intensive/waste
- carbon neutral

**Real-life examples:**

Ultimately, ECOS would like to assess the environment-related labels and claims as they appear on the product, taking into account the context in which they are displayed and communicated to consumers.

Examples of products ECOS would be interested in analysing (list far from exhaustive):

